

Scottish Government consultation on National Good Food Nation Plan for Scotland

Response from Obesity Action Scotland

Closing date: 22 April 2024

Obesity Action Scotland are members of the Scottish Food Coalition. We support their response to this consultation.

Question 1 – Does each individual Good Food Nation Outcome describe the kind of Scottish food system you would like to see?

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

Strongly agree

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.

Strongly agree

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

Mostly agree

Outcome 4: Our food and drink system 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

Mostly agree

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

Mostly disagree

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.

Mostly agree

Question 2 – What, if anything, would you change about the Good Food Nation Outcomes and why?

We broadly welcome the Outcomes in the Plan and the topics and issues they address. We'll address each of the Outcomes in turn below.

Outcome 1:

It is welcome that Outcome 1 includes nutritious and sustainable food. This is important as it moves commitments beyond simply 'adequate food' which is what has been committed to in previous policies.

In addition to reliable, we would also like to see some reference to nutritious and sustainable food being affordable within the Outcome as a recognition that cost is one of the main barriers reported to accessing healthy and nutritious food.

Outcome 2:

We support this Outcome and welcome its inclusion within the Plan. Achieving net zero is an important ambition for Scotland's food system and our National Good Food Nation Plan should support this.

Outcome 3:

It is welcome that Outcome 3 is included, in particular the inclusion of both physical and mental health, and the recognition of the importance of diet in influencing these. However, we feel there are several areas where the Outcome could be improved.

First, the Outcome could be improved by adding specific mention of weight. For example, there is scope in this Outcome to make an explicit connection between diet-related outcomes (currently mentioned in the Outcome) and weight (not currently mentioned). It's important that weight outcomes, such as obesity, are recognised here, given the clear link between diet, health, and weight.

Secondly, we disagree with use of the word 'encourage' in the Outcome. The food system must do more than simply encourage a physically and mentally healthy population. If we are to achieve the necessary changes we need to see to achieve this Outcome, the food system must as a minimum facilitate or enable a physically and mentally healthy population, through policies which make accessing healthy and sustainable food easy and affordable for everyone. We would therefore like to see the Outcome updated to say enable or facilitate, rather than encourage.

Thirdly, there is no mention of prevention within the Outcome. This is a significant omission. Prevention is critical to improve population health and wellbeing, and evidence shows the most effective policy actions that can be taken to improve the food environment are those focused on prevention¹. When discussing prevention, there is a need to ensure the focus is not on policies and programmes which centre on the individual/individual agency but instead is on those which are focused on addressing the systemic issues and wider determinants of health, including social, economic, environmental, and commercial determinants which we know from evidence are among the main drivers of these poor health outcomes. This needs to be recognised in the Outcome.

Finally, related to prevention, there is no mention or recognition of the need to take a whole system approach to improving population health and wellbeing outcomes. Simply focusing on one or two elements will not achieve the level of change we need to see to work towards achievement of the outcome. At Obesity Action Scotland, we have a toolkit available on our website which provides step-by-step guidance on a whole system approach for diet and healthy weight². Recognising the whole system of factors which influence population health, wellbeing and weight outcomes is essential and should be reflected in the Outcome in some way. In order to be healthy, citizens need to have the options available to enable them to be healthy, but this is not currently the case. We

¹ Pineda, E et al (2022) Policy implementation and priorities to create healthy food environments using the Healthy Food Environment Policy Index (Food-EPI): A pooled level analysis across eleven European countries. The Lancet, vol 23: 100522, <https://doi.org/10.1016/j.lanepe.2022.100522>

² <https://www.obesityactionscotland.org/wsa/overview/>

need to change the food environment to facilitate this. There is no recognition of this within the Outcome.

Outcome 4:

We acknowledge that the food and drink system, its businesses and workforce underpinned by fair work standards, should be prosperous, diverse, innovative, but with the proviso that innovation and incentives are orientated toward healthy, nutritious, and reasonably priced food. Rebalancing of the food industry in this way would then contribute maximally to national and local economic and social wellbeing. There is a risk that maximising the production and availability of foods that are high in fat, sugar and salt would have the opposite effect.

Outcome 5:

We mostly disagree with this Outcome, due to its focus on education.

We feel the Outcome is framed to suggest that the sections of the population who are not educated about food simply need to be better educated on making healthier food choices. We strongly contest the basis of this underlying assumption, as evidence shows that education campaigns and initiatives do little on their own to improve population health outcomes and improve diets, as they do not address the underlying causes and determinants of diet, health, and weight outcomes.

Evidence shows there are high levels of knowledge and understanding with regards to eating healthily among the population, but it is wider factors, principally the high cost and lack of access to healthier food, that prevents people from eating a healthy diet. For example, if we look at the 5-a-day campaign, data suggests that whilst as many as 85% of adults are aware of the messaging that they should be eating at least 5 portions of fruit and vegetables per day, only around a third of adults actually achieve 5-a-day. The primary reasons identified for this were availability and accessibility of healthy food, principally physical availability, and price³. Continuing to focus on education campaigns will not achieve the level of change required to improve population health and shouldn't be a focus of the National Good Food Nation Plan. The primary focus must be on action to address the wider structural determinants of health and improving the food environment, with education campaigns being a secondary focus (only after the former has been delivered).

This Outcome needs to be amended to acknowledge that education should only be delivered as part of a wider programme of interventions that address the wider structural factors influencing health and weight outcomes.

Outcome 6:

High-quality food is a fundamental element of good nutrition, but it must be nutritious and contribute to overall improvement in physical and mental wellbeing. Enabling a thriving food system that produces more highly processed food that is high in fat, sugar and salt may be of high quality, but it does not contribute to better population health. We agree with this outcome to the extent that Scotland should engage fully in efforts to develop food systems that ensure high quality, reasonably priced and widely available, healthy, and nutritious food for the whole population. Other countries will have made strides to achieve this objective. In that sense, Scotland must learn from best practice internationally. Obesity Action Scotland already contributes to that objective and would be keen to do more.

General comments:

Table 1 starting on page 11 of the Plan document outlines how each of the Outcomes are linked to the National Outcomes and Sustainable Development Goals. This is welcome. However, following a consultation process last year, it is our understanding that the National Outcomes and associated indicators are going to be updated but that this process has yet to be concluded. As we highlighted

³ Food Foundation (2023) Education and Information. How important are educational interventions as a tool for improving healthy diets? https://foodfoundation.org.uk/sites/default/files/2023-09/TFF_Education_briefing.pdf

in our response to the consultation on subject, we do not believe the National Outcomes in their current form are sufficient to improve population health and wellbeing⁴, and therefore support delivery of a Good Food Nation for Scotland.

It is positive that the Outcomes in the Plan are linked to the human rights agenda in Scotland and the Human Rights Bill. However, the Bill outlines a requirement *to have regard to* the right to food, for example. We do not believe that the expression is strong enough to deliver on this right. Related to this, page 10 of the Plan outlines that relevant authorities are required *to have regard to* the content of the Plan in relation to food policy decisions. As with the Human Rights Bill, we do not feel *have regard to* is strong enough to ensure that the content of the Plan will be properly considered or form the basis of decisions. The language needs to be strengthened to ensure this happens.

Question 3 – Do you think that these targets will contribute to achieving the overall Good Food Nation Outcomes?

Mostly agree

Question 4 – Would achieving these targets contribute to making a kind of Scottish food system you would like to see?

Mostly agree

Question 5 – If you have any other comments on the suggested Good Food Nation targets, please comment.

Our comments relate to the following targets in the Plan:

- halve childhood obesity by 2030 and significantly reduce associated diet-related inequalities
- increase levels of adult healthy weight
- reduce adult diet-related health inequalities
- reduce the number of households facing moderate to severe food insecurity

These targets feature under Outcomes 1 and 3. It's welcome that explicit targets on diet and healthy weight have been included within the Plan, and points to a recognition of the central role that our food system plays in determining population diet and healthy weight outcomes. We particularly welcome that the Scottish Government ambition to halve childhood obesity by 2030, first outlined in the 2018 Diet and Healthy Weight Delivery Plan⁵, has now been formally recognised as a target, and further extended to include significantly reducing diet-related inequalities.

We are concerned that many of the targets as they currently stand in the draft Plan are very broad, unspecific, and not measurable. For example, it is not made clear in the Plan how an increase in levels of adult healthy weight will be measured and what good looks like in that regard. The terms are subjective and open to interpretation. It is very challenging to get traction and support for changing diets when there aren't clear and measurable targets to track and report progress against. We would like to see the targets outline a clear and measurable direction of travel, such as *'achieve a 50% reduction in adult diet-related health inequalities'*. This is done with other targets included in the Plan such as those under Outcome 1 to have fewer than 5% of children living in absolute poverty by 2030 – this is clear and measurable and should be the model used for each target in the Plan.

It is common practice for targets to be SMART – in that they are specific, measurable, achievable, realistic, and timely – and we understand from engagement with relevant Government ministers on the Plan that they would like this to be the case for the targets within the Plan. Many of the current

⁴ <https://www.obesityactionsotland.org/campaigns-and-policy/consultation-responses/our-response-to-scottish-government-call-for-evidence-on-review-of-national-outcomes/>

⁵ Scottish Government (2018) A Healthier Future – Scotland's Diet and Healthy Weight Delivery Plan <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/07/healthier-future-scotlands-diet-healthy-weight-delivery-plan/documents/00537708-pdf/00537708-pdf/govscot%3Adocument/00537708.pdf>

targets (and indicators) within the Plan are not SMART. Targets (and indicators) that are measurable are critical to ensure progress towards achieving them can be monitored and for overall direction of travel to be assessed, measured, and monitored over time.

Further, the Plan also fails to provide any detail or background on the context of the targets. For example, in relation to the target of halving childhood obesity by 2030, it does not explain what halving childhood obesity means in practice i.e., what level of child obesity we would need to see to achieve this. This should be made clearer within the Plan to ensure this is both properly understood and able to be measured.

In relation to the food security target outlined in Outcome 1, we would like to see this amended to consider nutrition security more broadly. As part of a Good Food Nation, everyone should have easy access to the right nutrition they need to live healthy and fulfilling lives, and this goes beyond simply just ensuring food security.

In relation to additional targets, we would like to see a target within the Plan on the Scottish Dietary Goals. The Scottish Dietary Goals feature in the list of indicators listed under Outcomes 1 and 3 but says nothing about what the measurement of success will be in relation to these. We previously called for an explicit target on the Scottish Dietary Goals to be included within the Plan and we reiterate the call here. Our proposed target is ***Achieve the Scottish Dietary Goals by 2035***. We would like to see this target considered for inclusion in future versions of the Plan. The Scottish Dietary Goals are currently the main way in which the overall healthiness of the Scottish diet is assessed and progress towards achieving/meeting them is already monitored and recorded by Food Standards Scotland, with all available evidence indicating we are consistently failing to meet them⁶. It is therefore logical for there to be a target within the National Good Food Plan around achieving the Scottish Dietary Goals, with a set timescale to ensure this can be measured, tracked, and held to account over time.

Question 6 – Do you think these indicators will be useful for measuring progress towards the Good Food National Outcomes?

Mostly disagree

Please comment, why or why not?

Whilst we welcome the range and breadth of indicators identified in the Plan, we feel the indicators are not specific enough in many areas. We don't feel the indicators in their current form are sufficient to deliver and enable monitoring of progress towards the Outcomes and targets.

Additionally, no data sources for the indicators are provided, and neither is the timescale over which they will be measured. The indicators as outlined in the tables under each Outcome do not provide any detail on how they will be measured, with no information on what data sets/sources of data will be used to measure and monitor progress towards the indicators, which in turn makes it very challenging to monitor and measure progress.

The indicators also use unspecific terms like reduce and increase – this raises the question of what this means in practice and what success looks like. There needs to be more specific measures included like reduce by x%, for example.

Question 7 – What other indicators, if any, would you like to see included?

There are a number of additional/other indicators we would like to see included.

⁶ Food Standards Scotland (2020) Situation report: The Scottish Diet: It needs to change. 2020 update
https://www.foodstandards.gov.scot/downloads/Situation_Report_-_The_Scottish_Diet_It_Needs_to_Change_%282020_update%29.pdf

In Outcome 3, we would like to see an indicator on children's weight, recording the proportion of children that fall into each weight category – underweight, healthy weight, at risk of overweight and at risk of obesity. Currently, the indicators in the Plan only outline the percentage of children at risk of overweight and the percentage of adults and children who are a healthy weight. Including each weight grouping/category as indicators would be helpful to monitor and assess changes across the weight spectrum and to get a better understanding of changes in each category.

We note there are no indicators in relation to deprivation and weight in the Plan as it currently stands. Given the focus in the targets on reducing diet-related inequalities, this is an obvious gap that needs to be addressed – we cannot work towards targets on reducing diet-related inequalities if we don't have indicators which map out and measure weight outcomes in relation to deprivation. We would also like to see similar indicators for sex and age, to further contribute towards measuring diet-related inequalities.

Other indicators we would like to see included are dental decay in children, as a measurable indicator of diet, weight, and general health. Evidence shows that dental decay can be a consequence of a poor diet in children, with UK data suggesting that almost a quarter (24%) of children at age 5 have signs of tooth decay. This is also patterned by deprivation, with children from more deprived backgrounds more likely to present with signs of tooth decay than their less deprived peers⁷. Including an indicator on dental decay in children provides another mechanism for monitoring the impact of diet on children's overall health outcomes.

Question 8 – If you have any other comments on the suggested Good Food Nation indicators, please comment

The indicators currently included in the Plan are broadly welcome, but are they are not specific enough in many areas. For example, under both Outcomes 1 and 3, there is an indicator on the Scottish Dietary Goals. As mentioned earlier in our response, the Goals have simply been listed as an indicator, but it says nothing about what the measurement of success will be in relation to these i.e. is the indicator measuring if they have been achieved, compliance with them or how relevant they are in relation to the Scottish diet? This is not explained/outlined. The indicator needs to be made more specific, so it is clear what is being measured and monitored in relation to the Goals. We proposed an additional target on the Scottish Dietary Goals for the Plan in our response to question 5.

Outcome 1

Outcome 1 includes the Eating Out Eating Well Framework (EOEW) and other voluntary measures as an indicator. As voluntary measures such as these are known to be much less effective and impactful than mandatory measures for improving population diets and weight outcomes, we don't feel they should be included within the indicators, as they won't provide an overall picture as they will have limited reach and impact.

Outcome 3

Outcome 3 has the number of companies investing in reformulation listed as an indicator. However, simply measuring the number in this way is arbitrary and implies little about the impact on the healthiness of the food. Simply measuring or counting the number of companies who have invested in reformulation doesn't contribute towards meeting the objective and so should be removed as an indicator, and instead be replaced with one which records the nutritional changes/improvements of the food being reformulated, such as sugar and/or calorie reduction.

⁷ Food Foundation (2023) The Broken Plate: 2023. The State of the Nation's Food System
https://foodfoundation.org.uk/sites/default/files/2023-10/TFF_The%20Broken%20Plate%202023_Digital_FINAL..pdf

Outcome 5

Outcome 5 outlines an indicator on funding committed to food education. We feel this is problematic for a number of reasons. First, the amount of money allocated tells us nothing about how effective something is or will be. Secondly, we don't believe that food education should be included as a core indicator. Evidence shows that food education initiatives have limited effectiveness in terms of improving healthy weight and can actually widen inequality. The example of the 5-a-day campaign outlined in our response to question 2 is a good example of this.

We note community food projects are mentioned in this Outcome. We welcome many of these projects and the important role they play in supporting access to healthier food in local communities. In this regard, we would like to see them separated from food education and an estimate of their population coverage and potential impact on inequality incorporated in commentary.

Question 9 – Snapshot Box: As a child in a Good Food Nation

Does this reflect what you think life should look like for a child in Scotland as a Good Food Nation?

Mostly agree

What changes, if any, would you make?

We broadly welcome this vision for children in a Good Food Nation. However, there are a number of changes we would like to see.

There is no acknowledgement of inequality in the snapshot nor mention of addressing it. Given that addressing inequality is a strong focus of the targets and indicators in relation to children within the Plan, this is a significant omission and something that needs to be addressed. We would like to see an addition to this snapshot that outlines a commitment to reducing inequalities in a Good Food Nation for children.

There is also no mention of exposure to unhealthy food, which we feel is a significant omission. Evidence shows that children and young people are heavily exposed to unhealthy food and unhealthy food marketing in the daily environments⁸, and that this shapes their food norms and preferences⁹, which in turn impacts on diet and weight outcomes. We propose the inclusion of the following statement, or similar, in the snapshot box to account for this – *“I live, play and go to school in an environment where I'm not exposed to unhealthy food and the marketing of it”*. This links closely and is in line with the commitment of the UN Convention on the Rights of the Child (UNCRC), which Scotland has recently incorporated into law, to protect children from harm by reducing their exposure to aggressive unhealthy food marketing.

We note the snapshot mentions food education as a core focus. We have concerns about this and would like to see less focus on food education, recognising both the limited effectiveness and impact that food education on its own has.

Related to this, page 27 of the Plan recognises that healthy diets in early childhood contribute towards reducing childhood obesity. This is of course welcome and should be emphasised. However, the text that follows goes on to mention a range of initiatives to 'empower' and provide information in relation to reducing obesity in children. This retains the focus on the individual and individual level, education focused policies, which have been evidenced to have less or limited effectiveness in changing population weight outcomes. Relying on and promoting policies focused on individual

⁸ Scottish Obesity Alliance (2024) Adverts, adverts everywhere. Young people's perceptions of and exposure to unhealthy food marketing in Scotland <https://www.scottishobesityalliance.org/media/utujojqq/adverts-adverts-everywhere-report-final-version.pdf>

⁹ Boyland et al (2022) Association of Food and Non-alcoholic Beverage Marketing With Children and Adolescents' Eating Behaviors and Health A Systematic Review and Meta-analysis. JAMA Paediatrics 2022;176(7):e221037. doi:10.1001/jamapediatrics.2022.1037

agency in this way can also further widen inequalities, which the child-related targets and indicators in the Plan are focused on reducing. Instead, the focus should be on policies which change and improve the wider food environment and avoid harm.

Question 10 – Snapshot Box: As a parent/carer in a Good Food Nation

Does this reflect what you would like your life to look like, as a parent/carer in a Good Food Nation?

Mostly disagree

What changes, if any, would you make?

We mostly disagree. The points outlined in the snapshot are of secondary importance to statements that aim to show progress in altering the structural elements of Good Food availability and perpetuates the notion that individual knowledge and attitudes toward food and acquiring advice leads straightforwardly to changes in behaviour – it does not.

Most, if not all, of the points in the snapshot box have a strong focus on food education and rely heavily on personal responsibility, and education focused actions. This comes across most strongly on page 30 of the National Plan document where it discusses the wide, encompassing role of food education in schools and other settings for children. We recognise there is and should be a role for food education, but this shouldn't be the only focus for addressing population diet and improving weight outcomes. Continuing to focus on food education in this way will do very little to improve the overall diets and weights of our children and could contribute to further widening inequality. We would like the snapshot to have less focus on education and actions which require a high degree of individual agency, and shift towards a greater focus on and recognition of the impact of the food environment and wider structural factors.

In relation to bullet point four in the snapshot box on pregnancy and infant feeding, there is again a strong focus on individual agency, by suggesting that women can make fully informed choices about feeding their baby. Whilst we agree that women are likely to be fully informed about feeding themselves and their baby. i.e. they know what is healthy and nutritious, many women are simply not able to access the food they need for themselves and their baby, as a result of a broad range of structural factors and the food environment they experience on a daily basis, which mean they are not able to access healthy options. This needs to be recognised within the snapshot box and we would like to see bullet point four updated/amended accordingly to reflect this.

We note that there is no mention of never experiencing hunger within the snapshot box for parents and carers. This appears in the snapshot box for children, and we believe this should also be an aim for other population groups, in particular parents and carers. Evidence shows that parents/carers will often absorb or shield children from food insecurity issues and will often go without to ensure their children have enough to eat¹⁰. Further evidence indicates that this can also impact on children's mental health and wellbeing, as they can be aware of this stress and their parent/carer sacrificing their diet to protect their child(ren) from hunger¹¹. This indicates that including a focus on never experiencing hunger for parents and carers is also crucially important. Ensuring everyone has ready access to the food they need to keep them healthy and nourished should be a fundamental principle of a Good Food Nation.

¹⁰ Poverty Alliance and Scottish Women's Budget Group (2022) "It's hard work being poor" Women's Experiences of the Cost-of-Living Crisis in Scotland https://www.abrdn.com/docs?editionId=97ceb173-265d-4b8d-87dd-b349509ed24b&_gl=1*oxg3fh*_gcl_au*MTc2Mjg5NDZlE3MTE0NTQ2ODE.

¹¹ UK Parliament POST (2023) POSTnote 704 Child food insecurity and Free School Meals <https://researchbriefings.files.parliament.uk/documents/POST-PN-0704/POST-PN-0704.pdf>

Question 11 – Snapshot Box: As an adult in a Good Food Nation

Does this reflect what you would like your life to look like, as an adult in a Good Food Nation?

Mostly agree

What changes, if any, would you make?

Some of the statements in the snapshot address access and lack of money, but there is no mention of affordability of food within the snapshot which is a concern. A lack of affordability of healthy food has been identified as one of the main barriers which prevents people from eating a healthy, sustainable diet¹². We would therefore like to see something added on affordability to reflect this.

The final bullet point in the snapshot box should be removed or adapted, as it focuses too much on decision making by individuals, with no mention of the influence of wider determinants and the food environment. As has been highlighted throughout our response, we know these individual level policies to be much less effective. We would like to see the final bullet point amended to be less heavily focused on individual choice and decision-making.

Further, there is no mention of inequality within the snapshot. Like with the snapshot box on children, this is a significant omission, particularly given that many of the targets and indicators on adult diet and weight within the Plan have a focus on reducing inequality.

More broadly in the text that follows the snapshot box in the Plan, it is welcome that whole systems approaches are referenced, and their contribution recognised. It is also welcome that page 33 of the Plan outlines that ensuring access to a healthy diet is an important aspect of reducing diet-related health inequalities. However, the Plan says nothing about how this will be achieved or monitored. This needs to be set out clearly in order for it to be achieved.

Page 33 of the Plan also mentions reducing levels of undernutrition and developing a framework on malnutrition. It is welcome that a framework on malnutrition is proposed; however, it remains unclear if this will focus on malnutrition in all its forms. References to malnutrition are often focused on undernutrition only, which is the focus of the example cited in the current version of the Plan. We believe a focus on malnutrition in all its forms is more appropriate. This includes both underweight and overweight and obesity, with the possibility of malnutrition occurring at any point on the weight spectrum. This view of malnutrition is supported by the World Health Organization¹³, European Commission, and others. It is also a more accurate reflection of the current situation in Scotland – more than two-thirds of adults (67%) and a third of children (aged 2-15) are living with overweight and obesity¹⁴. We would like to see this reflected in the Plan and for it to be reflected in any framework on malnutrition that is developed. Focusing on malnutrition to mean only undernutrition misrepresents the true picture of diet and health in Scotland, and risks undermining the aims of a Good Food Nation for Scotland.

Question 12 – Snapshot Box: As a public caterer in a Good Food Nation

Does this reflect what you would like your life to look like, as a public caterer in a Good Food Nation?

Mostly agree

What changes, if any, would you make?

¹² Food Standards Scotland (2024) Food in Scotland. Consumer Tracking Survey Wave 16 Presentation of results (Aug 2023)

https://www.foodstandards.gov.scot/downloads/Food_in_Scotland_Consumer_Tracker_Survey_Wave_16_report.pdf

¹³ https://www.who.int/health-topics/malnutrition#tab=tab_1

¹⁴ Scottish Health Survey 2022 <https://www.gov.scot/publications/scottish-health-survey-2022-volume-1-main-report/pages/12/>

It is welcome that the section on public procurement underneath the snapshot box in the Plan outlines that public bodies are required to outline information on how the food they provide may improve the health and wellbeing of the communities in the local authority's area. In particular, it is welcome that there is a requirement listed for menus to be based on freshness, with high nutritional value using seasonal food.

We note the Plan outlines that public bodies should consider designing menus to include food with Protected Geographical Indication (PGI). Whilst this recognises the importance of using locally produced food and supporting these products, it's important that specifying the use of these foods does not lead to unhealthy food and drink products featuring heavily on menus, for example, where the local PGI food is a product that is high in fat, sugar and/or salt (HFSS), as this could undermine the aim of having a menu with high nutritional value (as outlined earlier). A balance needs to be struck to ensure healthiness and nutritional quality of food is given greater weight than other considerations, such as PGI status.

Page 39 in the Plan outlines that adequate nutrition plays an important role in enabling children to learn effectively and enjoy their time in school. In this context, we believe the standard detailed in the Plan should go further than adequate. As a minimum, the standard here should be nutritious and sustainable food which both promotes and supports health. We would like to see future iterations of the Plan updated to reflect this. The Plan then goes on to outline the Nutritional Requirements for Food and Drink in schools, which sets the standard for all food and drink served in schools. It is welcome these Standards have been recognised and included in the Plan. However, the focus on adequate nutrition earlier in the Plan (in this context) does not seem to match up with the Standards. No definition of adequate nutrition is provided, so it is unclear exactly what is meant by it and what the standard for 'adequate nutrition' will be.

Question 13 – Snapshot Box: As a retailer in a Good Food Nation

Does this reflect that you would like your life to look like, as a retailer in a Good Food Nation?

Not applicable

What changes, if any, would you make?

We have general comments to make about the related section in the Plan document. We do not represent retailers.

The snapshot box outlines that retailers in a Good Food Nation will work to create store environments that make healthy and nutritious options affordable and appealing for everyone. It is welcome this is recognised as a responsibility of retailers and is included in the Plan; however, we don't feel that the section of the Plan which follows for retailers would facilitate or enable this to happen.

This section of the Plan is where various policies such as regulations to restrict promotions of HFSS food and drinks and the Out of Home Action Plan, are mentioned for the first time. It is welcome that the role of retailers in creating healthier store environments through effective implementation of such regulations is recognised and outlined. However, it is concerning that this is the only place in the Plan where these critical regulations and legislation are mentioned and discussed. This suggests that the focus is on the impact of such regulations on the food and drink industry, rather than on improving population wellbeing, diet, and weight. There is little to no mention of the known positive impact for population diet and weight of these policies within the Plan. We would like to see greater recognition of this in future versions of the Plan and for the text to be relocated so the focus on improving health and weight outcomes is more explicit.

Additionally, we note these regulations and legislation are discussed immediately before a section on tourism in the Plan. This feels somewhat misplaced, and the detail gets a bit a lost as a result. The information on regulations and legislation within the Plan needs to be more clearly separated out. Also, the sub-section heading which the retailer snapshot box within the Plan sits under is titled *'Good Food Out of the Home: eating out and purchasing food'*. This could be interpreted to mean that such regulations and legislation would only apply to the out of home sector, rather than also in the retail sector. The text in the section does go on to mention retail but the sub-heading is misleading and could be made clearer with the sub-section renamed to reflect that it includes both retail shops and out of home premises.

In relation to this, we note there is no mention of the commercial determinants of health within the Plan or an acknowledgement of the impact and influences the practices of the food industry can have on population health outcomes and achieving a Good Food Nation. Broadly, the World Health Organization and others define commercial determinants of health as *"the private sector activities that affect people's health, directly or indirectly, positively or negative"*¹⁵. Based on this definition, we do not feel that the Plan acknowledges such practices and activities. As outlined above, the current version of the Plan does not give enough priority to discussing investment in meaningful legislation, such as restrictions on advertising and promotions of unhealthy food and drink, with little to no mention of the positive impact such policies will have for protecting and improving public health. Further, the Plan does not make it clear how the ambition and commitments of a Good Food Nation can be reconciled with the aims and ambitions of an industry-led food and drink strategy, which focus on business growth and profit, rather than health. The current version of the Plan is lacking in any detail on this.

Question 18 – If you have any further comments on the national Good Food Nation Plan, please comment here

General comments:

Overall, we feel the document is not laid out as a Plan and doesn't read as one. It essentially reads as a summary of everything the Scottish Government has done to date related to the food system in Scotland and articulates a vision for stakeholders in various respects. Perhaps this suggests a direction of travel for the future, but the elements are open to wide interpretation. By definition, a Plan should have a clear set of deliverable actions, with measurable and realistic targets, set against a time frame for delivery.

The Good Food Nation (Scotland) Act details that Plans produced under the legislation are required to be reviewed and updated every 5 years, with a progress report expected every 2 years¹⁶. It is welcome that this time scale for review and revision has been outlined within the opening section of Plan published for consultation, but it is currently unclear from the Plan how progress towards the targets and Outcomes will be monitored and measured over this time period. This needs to be more clearly outlined, with a clear timeline for measuring and monitoring progress against this time scale identified.

The information detailed in each snapshot box, and the accompanying sections of the Plan, for each group identified does not set out new information or commitments or provide comment on how actions and outcomes will be delivered to make the snapshot visions reality. Further, many of the examples outlined in the snapshot boxes and accompanying text remain focused on education and individual-level policies, rather than those with a focus on addressing the food environment and wider structural determinants that are known to be much more effective. This is disappointing and indicates a reluctance to take the required bold and urgent policy action needed.

¹⁵ World Health Organization (2023) Commercial determinants of health factsheet <https://www.who.int/news-room/factsheets/detail/commercial-determinants-of-health>

¹⁶ <https://www.legislation.gov.uk/asp/2022/5/enacted/data.pdf>

Overall, we feel the Plan lacks specific elements; it's very unclear what it will deliver and change in terms of improving the food system in Scotland, protecting health from harm, and indeed improving population wellbeing.

In relation to specific points in the Plan document:

Page 6 of the Plan outlines that local authorities and health boards, alongside the government, are the relevant authorities required to implement Plans and their associated Outcomes and actions. As well as these actors, we also need to bring in other actors to the process including producers, other private and third sector actors, at every stage of the process to ensure all aims, objectives and Outcomes of the Good Food Plans can be successfully implemented and delivered.

Page 24 of the Plan states: *"We will engage with the food-related business sector and other key stakeholders throughout the development and review of this plan and its future iterations"*. In relation to this, we note that the food-related business sector is the only sector specifically mentioned here, with all other stakeholders covered by a general catch-all term. This is problematic for a number of reasons. First, it suggests that the needs and interests of the food business sector are being prioritised and are more important than the interests of other stakeholders. To date engagement with the third sector on topics and themes detailed in the Plan has been limited. There is also very limited mention of consumers in the Plan, and they have not been identified as a core stakeholder group. Consumers are an important group in a Good Food Nation and this needs to be reflected. We are all consumers in a Good Food Nation and prioritising consumers ability to purchase healthy and sustainable food at an affordable price should be recognised. Secondly, by not identifying who the other key stakeholders are or intended to be, leaves it very unclear and open to interpretation with regards to who the Scottish Government are required to engage with. We would like to see a more detailed list of stakeholders identified in future iterations of the Plan.

Page 50 of the Plan introduces a section on food labelling. However, we are concerned that nutritional labelling is not mentioned at all in this section. Nutrition labelling provides an important function in informing consumers on the calorie and other nutritional content of the food they purchase and consume and can act as a catalyst for producers to provide healthier options for consumers. Evidence shows that front-of-pack traffic light labelling is more effective than other types of labels to help aid healthier purchases, and therefore should appear on all food packaging¹⁷. Of course, nutrition labelling on food is on its own not a silver bullet, but it is still nevertheless an important piece of the overall puzzle for transforming our food system, and for improving population health and weight outcomes. We would like to see future iterations of the Plan feature information and evidence on nutritional labelling, such as front-of-pack traffic light labelling, recognising them as important pieces of the overall jigsaw.

In the section on Scotland's food and drink industry on page 56 (in relation to the food processor snapshot box), alcohol is mentioned, specifically the role of the alcohol industry and their contribution to the economy. We are disappointed to note there is no reference to the role alcohol plays in our diets and in our food culture in this section or anywhere else in the Plan. Alcohol is an important source of excess calories in adults. Data from Food Standards Scotland shows that alcohol contributes around 9% of calories in adult diets in Scotland. Alcoholic drinks can also contain considerable amounts of sugar and are often mixed with syrups and sugary soft drinks, further contributing to excess sugar and calorie consumption¹⁸. We would like to see the National Good Food Nation Plan recognise and explicitly acknowledge this. Simply focusing on the contribution of the alcohol industry to the Scottish economy sends the wrong message with regards to priorities and lacks recognition of the links between alcohol, diet, and health outcomes.

¹⁷ Obesity Action Scotland (2019) Obesity and labelling briefing https://www.obesityactionscotland.org/media/tglla33t/obesity_labelling_b-30.pdf

¹⁸ Food Standards Scotland (2020) Situation Report: The Scottish Diet: It needs to change https://www.foodstandards.gov.scot/downloads/Situation_Report_-_The_Scottish_Diet_It_Needs_to_Change_%282020_update%29.pdf

We note the conclusion section on page 60 of the Plan document outlines that the Scientific Advisory Committee's work on ultra-processed foods (UPFs) will be considered in the next iteration of the Plan. We propose that the focus should instead be/remain on food and drink products high in fat, salt and sugar (HFSS). There is ongoing debate and evidence is still emerging with regards to UPFs. Evidence shows that it is the discretionary HFSS products, the majority of which are also UPFs, that are most harmful to our health, and which are the main contributors to excess calories in diets¹⁹. UPF also covers a much wider range of products than HFSS, is contested in ways that diffuse the identity of the key issues of unhealthy nutritional balance and food manufacturing at the expense of population health, is not widely understood by all stakeholders, and as yet there is not a universally agreed definition, which makes using them as the basis of policy decision-making much more challenging. Therefore, focusing on HFSS food and drink products for the time being is more likely to identify the key issues and garner support from a wider range of stakeholders – it will be easier to communicate in messaging, easier for the public to understand, and reduces the potential for a lack of action from food producers/industry. It is important to stress that any food policy decisions in relation to HFSS products and any other areas should not undermine or contradict a future trajectory of policy action on UPFs, and should have a positive impact on population health, diet quality, and weight outcomes. In the first instance, we would like to see the current and future iterations of the National Good Food Plan continuing to prioritise action on HFSS products to ensure that linked reductions of harm to health is the key outcome, delivered with the urgency and depth required.

Currently missing from the Plan:

Missing from the Plan is an acknowledgement of what is missing. The Plan needs to be explicit on what the gaps are in order to develop and improve outcomes and indicators going forward for future iterations.

Specifically, there are a few issues/topics we believe are missing from the Plan which we would like to see included in future iterations.

First, the Plan fails to make any linkages with wider policy objectives and frameworks. The Good Food Nation Plan needs to extend its reach beyond food policy initiatives. Food is such an integral part of so many aspects of people's lives that it cannot be seen in isolation. It is well evidenced in the literature that to achieve a healthy food system/environment and tackle issues of overweight and obesity, there is a need to look beyond focusing on food policy initiatives, to remove siloes in current national and local policy development and take into consideration wider social, economic, and commercial determinants of health. Access to food, for example, is very closely linked to and often determined by factors such as financial circumstances, community planning and infrastructure, and availability of public transport, to name a few. The Plan document does outline and show links with wider aspects of food policy, but it largely fails to make these connections out with food and associated policies. Without directly acknowledging and specifically linking to these other areas, the overall aims and ambitions of a Good Food Nation are unlikely to be achieved.

Further, action to align with other major and related policy areas is essential to ensure policy coherence. Some policies can indirectly act to reduce the incidence of obesity via policy actions with other motivations. For example, policies related to climate change and health inequalities have been identified as being of particular importance in the development of strategies to tackle obesity and deliver healthy food systems²⁰. This was explored in a 2019 report by the Lancet Commission which

¹⁹ Food Standards Scotland (2023) Consumption of discretionary foods and drinks and other categories of dietary concern in adults (16+ years) <https://www.foodstandards.gov.scot/publications-and-research/publications/consumption-of-discretionary-foods-and-drinks-and-other-categories-of-dietary-concern-in-adults-16-yr>

²⁰ Government Office for Science (2007) Foresight Tackling Obesity: Future Choices – Project Report, 2nd edition https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/287937/07-1184x-tackling-obesity-future-choices-report.pdf

introduced the idea of “the Global Syndemic” – the challenges of obesity, climate change and undernutrition are closely aligned and by bringing them all together under the “Global Syndemic” concept, there is increased potential to strengthen action and also accountability on all three challenges²¹. Additionally, the National Food Strategy report²² outlines the significant negative impacts of junk food and calls for a focus on breaking what it calls the junk food cycle. Importantly, it stresses that the best and most effective way to do this is through change to the food system, with structural, economic, and cultural changes required at all levels. Addressing these challenges requires a comprehensive and systems-oriented approach. Cross-government, cross-sector collaboration must be a key outcome. This will ensure that key decisions that are made on food consider the impact beyond food policy and the food system.

Furthermore, the wellbeing economy approach is not mentioned within the Plan. The wellbeing economy is emerging as a core theme of the Scottish Government, and it is therefore important to ensure alignment between this and the Good Food Nation approach. This is currently missing from the Plan.

Secondly, there is very limited mention of stigma in the Plan. There is no mention of weight stigma and stigma associated with food insecurity. This is a significant omission, as weight stigma has been identified as a key barrier for improving health outcomes, and for achieving support for policy action and interventions. If the Plan encourages a vision of the future and ideal state, we would like to see future iterations of the Plan better integrating effective measures to address these types of stigma and their impacts, alongside a commitment for all activities to be focused on ensuring they are non-stigmatising. Reducing stigma is a key focus in many other policy areas and should be replicated here. Further, there is also no mention of protected characteristics groups – those identified under the Equality Act 2010 – in the Plan and how they will be protected and supported by the implementation of the Plan and delivery of a Good Food Nation. At the very least cultural, ethnic and religious diversity, with their additional nutritional and social dimensions, should have due recognition in the plan.

Thirdly, the term ‘plant-based’ or ‘plant-forward’ is not mentioned anywhere in the Plan document. If we are to achieve our aims and targets on both improving population health and weight outcomes and reducing the impact of our food on the environment, we need to see a shift in our diets towards more plant-based foods. Achieving this shift will require supportive national level policy interventions to deliver the required scale and pace of change, and so should be reflected in the National Good Food Nation Plan. We would like to see commitments to progressing towards this included in future iterations of the Plan. This dimension is essential in reconciling good food with the overriding climate emergency.

Question 19 – Please let us know if we have missed any function falling within a specified description or relevant specified functions in the list?

We understood that the whole objective of the Good Food Nation (Scotland) Act 2022 and its associated National and Local Plans, is that it will apply across all areas of government and policy. This therefore raises the question as to why there is a need to set out specified functions (and specific areas) in this way within the National Plan, if the aim is for this to be a whole of government/whole of Scotland approach? Outlining a specific list in this way suggests this is a limited function for only certain sections of the Government and for specific pieces of legislation, and also doesn’t account for the impact that food and the food system might can and does have on other areas of policy which on the surface don’t seem to be influenced by or influence the food system, but which actually do. Outlining specific measures is challenging in ensuring all relevant

²¹ Swinburn B, Kraak VI, Allender S, et al (2019) The Global Syndemic of Obesity, Undernutrition and Climate Change: The Lancet Commission report, Lancet 393(10173):791-846

²² National Food Strategy Independent Review (2021) The Plan <https://www.nationalfoodstrategy.org/>

functions are specified and in keeping the list up to date as new legislation is passed, but essential in achieving coherence in policy-making and the degree of public support that Good Food measures need to sustain.

Part B of the consultation document on specified functions on page 24 under Outcome 1 identifies the provision of food in schools, and a range of public sector settings, as a specified function. We would like to see this updated to move beyond just food and instead explicitly state healthy and sustainable food and drink. Simply ensuring the provision of food is not sufficient to deliver on the Outcomes and objectives of a Good Food Nation and of the National Plan.

Question 20 – Why do you think this specified function/function failing within a specified description should be added?

We would like to see the Planning (Scotland) Act 2019²³ added as a specified function, and the associated National Planning Framework 4 (NPF4)²⁴. The planning system plays a critical role in shaping the food environments experienced every day, through planning application decisions which determine the location of premises selling food and other amenities. NPF4 offers some important opportunities with regards to the provision and availability of healthy food in a neighbourhood, such as developments not being supported that will have an adverse impact on health and local place and development plans identifying areas where healthy food and drink outlets can be supported. These aspects of the NPF4 are outlined and recognised earlier in the Plan document on page 32, specifically in relation to healthy food and drink, and supporting a physically and mentally healthy population. Given this recognition of the importance of the planning system to the food environment/system, and specifically the ways in which NPF4 can facilitate access to healthy food, it is therefore logical that NPF4 and the Planning (Scotland) Act should be listed within the specified functions of the National Plan.

Whilst much of the decision-making power and responsibility for planning lies with local authorities, ensuring it is featured appropriately in the National Plan highlights its importance in relation to the food system, and ensures it is much more likely to be considered within the Local Food Plans.

About us

Obesity Action Scotland provide clinical leadership and independent advocacy on preventing and reducing overweight and obesity in Scotland.

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²³ <https://www.legislation.gov.uk/asp/2019/13/contents/enacted>

²⁴ Scottish Government (2023) National Planning Framework 4

<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2023/02/national-planning-framework-4/documents/national-planning-framework-4-revised-draft/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4.pdf>