

8 November 2024

Joint Call for Robust Food Governance in Scotland

Dear Cabinet Secretary Neil Gray,

We are writing to express our deep concern and seek your intervention to address the growing gaps in the governance of food, diet and weight in Scotland and its implications for people's wellbeing. We call for urgent action to:

- **Safeguard food policy development from commercial interests**
- **Make all regulations in the Out of Home sector mandatory**
- **Strengthen cross-departmental working and embed dietary goals in the Good Food Nation delivery**

Currently, more than two-thirds (67%) of adults in Scotland have overweight or obesity, and a third of children aged 2-15 are at risk — the highest recorded level since 2011. These figures are also underpinned by persistent inequalities, with our most deprived households much more likely to be experiencing obesity, alongside the growing cost of £5.3bn from obesity to the country's economy. [Food Standards Scotland data](#) shows that 20% of the fat and 50% of sugars we consume come from discretionary foods, and that this is driven by promotions of high in fat, sugar and salt (HFSS) food.

The recently published report of the House of Lords Food, Diet and Obesity Committee '[Recipe for health: A plan to fix our broken food system](#)' (HoL report) sheds light on good practices that can help transform Scotland's food governance. Among the recommendations, the report calls for comprehensive, mandatory regulation of the food industry and for their exclusion from policy formulation. In view of this, we suggest a few ways these recommendations can be taken forward by the Scottish Government and partners.

Firstly, Scotland needs a food governance system that safeguards public health policy making from commercial interests. To begin with, the remit of the Scottish Government's New Deal for Business Group needs to be amended to remove public health policy development. It is disconcerting that the stated aims of the Group include discussing the development and implementation of public health policy and regulations. The HoL report spotlights the clear conflict of interest in government engagement with industry throughout the policy making process. We would encourage the government to take forward the recommendations in NCD Alliance Scotland's recently published [10 year Vision for a Healthier Scotland](#) and introduce a better governance framework in ensuring that public health decisions are protected from commercial interests that distract from the non-communicable diseases response.

Secondly, all activities under the Out of Home Action Plan for Scotland need to be mandatory. This includes the Code of Practice for Children's menus, calorie reduction in the out of home sector and nutrition and calorie labelling information. The HoL Committee argues, and evidence indicates, that voluntary measures are ineffective for delivering outcomes. For example, the introduction of mandatory calorie labelling for large businesses in England in April 2022 has been modelled to show positive impacts on health, including potential for a reduction in deaths from cardiovascular diseases. The recently released [NESTA Blueprint](#) for halving obesity offers promising suggestions for requiring food businesses to be accountable for the



nutritional value of the food they produce. These measures, alongside a range of other mandatory population health measures, would result in the change to the food environment we so desperately need to see.

Thirdly, it is critical to strengthen cross-departmental working in national and local food governance for coherence, coordination and delivery. The HoL report emphasises the importance of taking such an approach, highlighting that “*all departments are involved in tackling obesity*,” and calls for an effective cross-government governance structure to deliver coordinated action across the food system. In Scotland, we need to see this approach replicated, if we are to truly deliver on a Good Food Nation for every resident. This would require establishing cross-sectoral committees at national and local levels and ensuring that health is considered a core part of delivering the Good Food Nation approach.

Scotland’s Diet and Healthy Weight Delivery Plan adopted in 2018 outlines government commitments to improve the population’s health. Six years on, many of the legislative interventions proposed and detailed in the Plan are yet to be realised. At the same time, there has been a worrying shift towards increasing commercial actor engagement in public health policy development. Findings from a recent public engagement [project](#) highlight increasing public recognition of this shift, and criticism of the profit-driven decisions of the industry and their tactics to influence policy.

The evidence, public perception and the report from the House of Lords signal the need for an urgent and important paradigm shift in how food governance is managed and delivered. Scotland has the necessary devolved powers to act in each of these areas.

We encourage you to champion the establishment of an effective governance system for food, diet and weight that is transformative, delivers outcomes and serves public interest. We offer our whole-hearted support to your efforts to truly improve population weight outcomes and create a healthier food environment for all, enabling people to live longer, happier lives.

Signed:

Coalitions and organisations

- Scottish Obesity Alliance
- NCD Alliance Scotland
- Scottish Food Coalition
- Obesity Action Scotland – Dr Shoba John, Head
- Academy of Medical Royal Colleges and Faculties in Scotland – Professor Steve Turner, Chair
- British Dental Association – Robert Donald, Chair of Scottish Council
- British Dietetic Association – Liz Stockley, Chief Executive Officer
- British Medical Association Scotland – Erin Robertson, Senior Communications and Public Affairs Manager, BMA Scotland
- Voluntary Health Scotland – Tejesh Mistry, Chief Executive
- The Scottish Pantry Network – Mandy Morgan, Chief Executive Officer
- Glasgow Centre for Population Health – Professor Chik Collins, Director
- Royal College of Physicians of Edinburgh – Professor Andrew Elder, President
- Children’s Health Scotland – Helen Forrest, Chief Executive

- Soil Association Scotland – David McKay, Co-Director
- Edinburgh Community Food – Jo Howie, Food and Health Development Team Lead
- The Breastfeeding Network - Catherine Hine, Chief Executive Officer
- Diabetes Scotland – John Kinnear, National Director for Scotland
- Common Weal – Robin McAlpine, Head of Strategic Development

Individuals

- Professor Mary Brennan, Chair of Food Marketing and Society, University of Edinburgh Business School
- Professor Jeff Collin, School of Social & Political Science, University of Edinburgh
- Dr Lauren Carters-White, Lecturer in Public Health & Deputy Programme Director Master of Public Health (Online) Fellow Advance HE, University of Stirling