



The Scottish Parliament  
Pàrlamaid na h-Alba

Published 30 September 2025  
SP Paper 875  
8th Report, 2025 (Session 6)

## Health, Social Care and Sport Committee

# Report on the Proposed National Good Food Nation Plan



**Published in Scotland by the Scottish Parliamentary Corporate Body.**

---

All documents are available on the Scottish  
Parliament website at:  
<https://www.parliament.scot/documents>

For information on the Scottish Parliament contact  
Public Information on:  
Telephone: 0131 348 5000  
Textphone: 0800 092 7100  
Email: [sp.info@parliament.scot](mailto:sp.info@parliament.scot)

# Contents

<b>Membership changes</b>	<b>1</b>
<b>Executive Summary</b>	<b>2</b>
<b>Introduction</b>	<b>6</b>
<b>Background</b>	<b>7</b>
Good Food Nation (Scotland) Act 2022	7
The Proposed National Good Food Nation Plan (the Plan)	7
<b>Health, Social Care and Sport Committee consideration</b>	<b>9</b>
<b>Scope of the Proposed Good Food Nation Plan</b>	<b>10</b>
Leadership	10
Local translation	11
Improved public health	12
<b>Population Health Framework 2025-2035</b>	<b>14</b>
<b>Common themes raised in evidence</b>	<b>17</b>
Food education and cooking skills	17
Food in health and social care settings	19
School meals and early years nutrition	19
'One health' approach	21
Food environment and Ultra-Processed Foods (UPFs)	23
Equity of access to nutritious food	24
Procurement, supply chain reform and the food industry	25
Mental health, the third sector and social wellbeing	27
<b>Plans for implementation</b>	<b>30</b>
<b>Proposals for measuring progress</b>	<b>31</b>
<b>Conclusion</b>	<b>34</b>
<b>Annexe A: Extracts from Committee minutes</b>	<b>35</b>
<b>Annexe B: Evidence</b>	<b>37</b>

# Health, Social Care and Sport Committee

To consider and report on matters falling within the responsibility of the Cabinet Secretary for Health and Social Care.

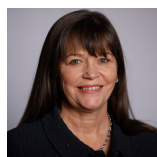


[hscs.committee@parliament.scot](mailto:hscs.committee@parliament.scot)

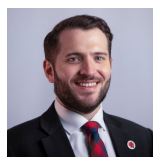


0131 3485979

# Committee Membership



**Convener**  
**Clare Haughey**  
Scottish National Party



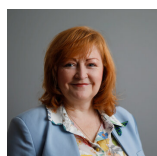
**Deputy Convener**  
**Paul Sweeney**  
Scottish Labour



**Joe FitzPatrick**  
Scottish National Party



**Sandesh Gulhane**  
Scottish Conservative  
and Unionist Party



**Emma Harper**  
Scottish National Party



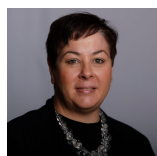
**Patrick Harvie**  
Scottish Green Party



**Carol Mochan**  
Scottish Labour



**David Torrance**  
Scottish National Party



**Elena Whitham**  
Scottish National Party



**Brian Whittle**  
Scottish Conservative  
and Unionist Party

# Membership changes

1. There were no changes to the Committee's membership during the Committee's scrutiny of the Plan.
2. The following declarations of interest were made during the Committee's scrutiny:
  - Sandesh Gulhane MSP declared an interest as a practising NHS GP.

# Executive Summary

## Scope of the Plan: Leadership

3. The Committee highlights concerns raised in oral and written evidence that the Plan remains "quite siloed" in its approach and lacks the necessary detail concerning mechanisms that will foster the level of cross-sector and cross-portfolio collaboration necessary to deliver its outcomes. The Committee concludes that the Plan should demonstrate more clearly how the Scottish Government will lead this work.

## Local translation

4. The Committee highlights stakeholder concerns about the potential for conflict between national outcomes and priorities as set out in this Plan and those outcomes and priorities to be subsequently developed in local (local authority and health board) plans, informed by local circumstances. It further highlights the need for further collaboration and dialogue between the Scottish Government and those responsible for developing local plans to ensure proper coordination of national and local priorities and to avoid the risk of national and local plans conflicting with one another.

## Improved public health

5. The Committee calls on the Scottish Government to set out what mechanisms it will put in place to ensure competing priorities in different areas, as highlighted in written and oral evidence, do not result in policy inertia or inhibit realisation of the Plan's stated outcomes.

## Population Health Framework 2025-2035

6. The Committee highlights stakeholder concerns that the Plan's focus on tackling obesity and overweight, and how this is measured, needs to be carefully considered in the context of many individuals, particularly in older demographics, who may be suffering from malnutrition. It calls on the Scottish Government, in finalising the Plan, to make every effort to ensure that its primary focus remains on addressing the whole food environment rather than placing the onus on individual behaviour.
7. The Committee highlights the important responsibilities the food industry has in contributing actively to the delivery of health and sustainability outcomes.
8. The Committee draws attention to calls from stakeholders for the Plan to shift its focus on the role of the food industry in delivering a Good Food Nation from one that primarily emphasises the industry's economic contribution towards one that

emphasises its contribution towards delivering health and sustainability outcomes. The Committee calls on the Scottish Government, in responding to this report, to address these concerns directly.

9. The Committee highlights the need for greater consistency in the use of indicators across multiple policy frameworks, notably the Plan currently under scrutiny and the Population Health Framework. It believes this will help to ensure a unity of purpose towards creating a Good Food Nation across these different frameworks, as well as reducing unnecessary administrative burden on those responsible for monitoring progress.

### **Food education and cooking skills**

10. The Committee acknowledges a range of views on the issue of food education. It further acknowledges the concerns expressed by certain witnesses in oral evidence that placing an undue focus on developing cooking skills risks shifting the onus of the Plan from tackling the wider food environment towards an emphasis on addressing individual behaviour. At the same time, the Committee firmly believes there is an important role for education in shifting broader attitudes to food and food culture and that this must be seen in the context of addressing wider barriers to healthy, sustainable, affordable and convenient food choices..
11. The Committee recognises the importance of convenience in modern society and the need, in that context, for healthy and sustainable food options to be convenient for the vision of a Good Food Nation to be successfully realised in Scotland. It has therefore been particularly interested to learn of examples of the development of community diners as a means of giving people easier and more convenient access to affordable, locally sourced, healthy and sustainable food. The Committee recognises ongoing work to explore the development of similar schemes in Scotland and calls on the Scottish Government to commit the resources necessary to support their more strategic and systematic implementation as part of the Plan.

### **Food in health and social care settings**

12. The Committee is firmly of the view that, for a Good Food Nation to be successfully realised, the health and social care sectors will need to be involved as equal partners in the development and delivery of national and local plans, both as procurers of food for patients and residents, but also with respect to addressing wider public health concerns.

### **School meals and early years nutrition**

13. The Committee recognises the pivotal role of schools in fostering healthy eating at an early age and in delivering a Good Food Nation. In this context, it notes

widespread support in oral and written evidence for the wider roll-out of universal free school meals. It also recognises that planning policy, collaboration with food outlets located in the vicinity of schools and making staying in school over lunchtime a more attractive option all have a role to play in improving children's nutritional health.

### **'One health' approach**

14. The Committee highlights stakeholder calls for the Plan to place a greater emphasis on a 'One health' approach towards creating a Good Food Nation. It further notes evidence that, for this to be achieved, there will be a need for a wide range of policy areas, and particularly food production, to be better aligned towards collectively meeting the goals that underpin a 'One health' approach.
15. The Committee also notes the Plan does not yet address some of the inherent problematic issues arising from the food and drink industry. It calls on the Scottish Government to respond to evidence it has heard about the potential public health impact of health-harming products such as alcohol, and levels of consumption of red and processed meats.

### **Food environment and Ultra-Processed Foods (UPFs)**

16. The Committee is firmly of the view that, in light of emerging evidence of their negative impact, a clear and comprehensive definition of ultra-high-processed foods and ultra-processed foods is urgently needed. It further believes that policy development in this area needs to be led by public health interest rather than the economic interests of the food industry. In this context, it calls on the Scottish Government to keep this area under active review and to be ready to incorporate any agreed policy response into future iterations of the Plan.

### **Equity of access to nutritious food**

17. The Committee recognises the critical importance of delivering equity of access to nutritious food across the Scottish population as a fundamental prerequisite for achieving a Good Food Nation. In this context, it highlights stakeholder views that the Plan should place greater emphasis on monitoring levels of food insecurity as a mechanism for measuring the Plan's success in overcoming unequal access to nutritious food.

### **Procurement, supply chain reform and the food industry**

18. The Committee highlights stakeholder evidence in favour of creating clear guidance for public bodies to ensure Good Food Nation principles are effectively embedded into food procurement practices. It calls on the Scottish Government to provide a commitment that this will be a core component of the Plan's

implementation.

### **Mental health, the third sector and social wellbeing**

19. The Committee recognises the critical role third sector organisations play in delivering many successful community initiatives to promote access to, and growing of affordable, locally sourced, healthy and sustainable food. It further recognises calls in evidence for a commitment to fair funding to give these organisations the confidence to plan and invest long-term in the continued delivery of these initiatives.
20. The Committee recognises the huge potential for improvements to Scotland's food environment to have significant benefits to our mental health. It highlights stakeholder evidence arguing for a greater emphasis in the Plan on indicators related to mental health as an important measure of its successful implementation. It further notes that the positive mental health impacts of access to good food, eating together and growing food are well-evidenced.

### **Proposals for measuring progress**

21. The Committee highlights widespread evidence calling for greater clarity concerning the purpose and role of the proposed Scottish Food Commission, including in relation to monitoring and data, capacity and resourcing, lines of accountability, and how it will collaborate and interact with other bodies and decision-makers to achieve effective delivery of the Plan.

### **Conclusion**

22. The Committee draws its recommendations to the attention of the Scottish Government and calls on it to ensure these are suitably addressed in its preparation of the finalised national Good Food Nation Plan.

# Introduction

23. The Rural Affairs and Islands (RAI) Committee was the lead Committee for scrutiny of the [Good Food Nation Bill](#), a [framework bill](#) introduced by the Scottish Government with the aim of creating a coordinated approach to Scotland's food. As part of its scrutiny of the Bill, the RAI Committee [sought the views of the Health, Social Care and Sport Committee](#), along with [other subject committees](#) in light of the cross-cutting nature of the Bill.
24. The Good Food Nation Bill received Royal Assent, becoming the Good Food Nation (Scotland) Act 2022, on 26 July 2022.
25. Section 1 of the Good Food Nation (Scotland) Act 2022 specifically requires Scottish Ministers to prepare a national plan.
26. The deadline for the Scottish Government to have laid the proposed national plan is "not later than the end of the period of 12 months beginning with the day on which" the relevant section of the Act comes into force. This means the Scottish Government is required to lay the proposed national plan in the Scottish Parliament by 30 June 2025.
27. According to the Good Food Nation (Scotland) Act 2022, the Scottish Government is required to lay the proposed national plan "before the Scottish Parliament for a period of 60 days, of which no fewer than 30 days must be days on which the Parliament is neither dissolved nor in recess".
28. During this period, before finalising the GFN national plan, Scottish Ministers are required to have regard to:
  - (i) any representations about the proposed plan that are made to them,
  - (ii) any resolution relating to the proposed plan passed by the Parliament, and;
  - (iii) any report relating to the draft plan published by any committee of the Parliament for the time being appointed by virtue of the standing orders.
29. Accordingly, the [Proposed National Good Food Nation Plan](#) was published by the Scottish Government along with a number of supplementary documents on 27 June 2025, the final sitting day before Parliament's summer recess period began.
30. In the limited time available, the Committee has worked closely with the Local Government, Housing and Planning Committee and the Rural Affairs and Islands Committee to co-ordinate effective scrutiny of the Proposed National Good Food Nation Plan. Each Committee focused on elements within their remits, but fully acknowledged the broad themes - climate change, inequalities, public health - and complex challenges entailed in the Plan.
31. Once the final plan has been published, before 31 December 2025, it must be reviewed every five years and have regard to recommendations made by the [Scottish Food Commission](#).

# Background

## Good Food Nation (Scotland) Act 2022

32. The [Stage 1 Report](#) on the Good Food Nation Bill by the RAI Committee highlights the changes sought by GFN policy through the Bill. In relation to public health specifically – which covers more than half of the aims – these changes aimed to ensure:
- people who serve and sell food – from schools to hospitals, retailers, cafes and restaurants – are committed to serving and selling good food;
  - everyone in Scotland has ready access to the healthy, nutritious food they need;
  - dietary-related diseases are in decline, as is the environmental impact of our food consumption;
  - Scottish producers ensure that what they produce is increasingly healthy and environmentally sound.

## The Proposed National Good Food Nation Plan (the Plan)

33. The Proposed National Good Food Nation Plan (the Plan) is 85 pages in length and is made up of four main sections, with the vision being defined in [Part One](#) as:
- ” [...] a Good Food Nation, where people from every walk of life take pride and pleasure in, and benefit from, the food they produce, buy, cook, serve, and eat each day.
34. The Plan also describes how a Good Food Nation may look in practice in relation to childhood, adult life, out of home eating and retail, and food production and processing.
35. The Plan outlines six outcomes setting out the ‘subject areas and principles set out in the Act’. These are intended to ‘guide aspirations for everyone in Scotland’.
36. [Part Two](#) of the Plan covers implementation, with a focus on the Scottish Government’s organisation, its role and duties, and the need for changed perspectives within government. It also sets out how overarching policies are to be covered, including Climate Change, Wellbeing Economy, Child Poverty, Food Safety, standards and Nutrition, Population Health Framework.
37. [Part Three](#) of the Plan covers measuring progress, including various targets and indicators.
38. [Part Four](#) requires that the Plan sets out the food related policies that the Scottish Ministers intend to pursue in order to secure the achievement of the Outcomes set

out in Part One. This first plan establishes a base line in terms of policies that should make a contribution to realising the GFN ambitions.

39. These policies are set out under four subheadings –

- People and Communities
- Providers and Places
- Farmers, Food Producers and Processors
- Strategic and Overarching Policies.

# Health, Social Care and Sport Committee consideration

40. A Scottish Parliament [call for views](#) was issued on 30 June 2025 which ran until 15 August 2025, in collaboration with the Local Government, Housing and Planning Committee. The call for views received [65 responses](#).
41. The Health, Social Care and Sport Committee then considered the Proposed National Good Food Nation Plan at its meeting on [2 September 2025](#).
42. The Committee first heard evidence from a panel of stakeholders comprised of -
  - Mhairi Brown - Food, Farming and Countryside Commission Scotland
  - Anna Chworow - Scottish Food Coalition (administered by Nourish Scotland)
  - Professor Lindsay Jaacks - Good Food Nation Lab, University of Edinburgh
  - Claire Hislop - Public Health Scotland
43. At this same meeting, the Committee took evidence from the Cabinet Secretary for Rural Affairs, Land Reform and Islands, Mairi Gougeon MSP, and supporting Scottish Government officials.

# Scope of the Proposed Good Food Nation Plan

## Leadership

44. A number of submissions to the HSCS and LGHP Committees' call for views referred to the scope and challenge of the Good Food Nation ambition and made suggestions to improve the Plan to promote better collaboration.

Scotland Excel stated:

” The Plan should promote stronger collaboration between local authorities, NHS boards, and social care providers in developing joined-up food procurement strategies. Scotland Excel is well placed to support shared frameworks that meet the needs of multiple sectors, reducing duplication and improving consistency.

45. The Scottish Wholesale Association expressed some frustration at the Plan and made a plea for a clear delivery roadmap:

” As a strategic framework, the Plan successfully brings together a wide range of existing policies relating to food, health, sustainability, and the economy. While we support this integrated, whole-system approach, we remain concerned about how policy conflicts will be resolved. Balancing public health priorities, the need for sustainable growth in the food and drink industry, and Scotland's broader economic transformation goals will require ongoing engagement and clarity from the Scottish Government.

We understand the Plan is intended as an internal compendium of existing food-related policies, and that this consolidation has value - particularly for cross-government coordination and accountability. However, it has taken considerable time and largely restates what is already known. It does not yet offer a clear sense of how we move from baseline-setting toward meaningful change. While coherent and positive, it lacks momentum and a clear delivery roadmap.

The focus is on outcomes, indicators, and targets, with little asked on the delivery mechanisms needed to support the Plan. SWA believe the latter is critical to getting businesses on board and to physically deliver the Plan. While it explicitly acknowledges that the outcomes are ambitious and will take longer than one plan cycle to deliver, it does not include any new policies or programmes to drive this agenda forward.

46. Those stakeholders giving oral evidence to the Committee were in agreement that the Plan requires a greater focus on delivery and cross-sector collaboration. Claire Hislop from Public Health Scotland told the Committee:

” It needs to engage more on how we will get other stakeholders involved. This is going to take a whole-system approach, so we need other actors in the system to work together, and we need to outline better how we will do that.

47. Anna Chworow from Nourish Scotland agreed with this viewpoint and placed additional emphasis on the importance of collaboration to deliver the Plan's goals:

” We need not just a whole-Government effort but a whole-society or national endeavour. Therefore, it is key to outline clear mechanisms for collaboration between local authorities, health boards, civil society, community groups and businesses as well as the new independent food commission. However, it has not been evident in how we have developed the proposed plan thus far that such collaboration is at the forefront of people's minds.

Anna Chworow concluded:

” The plan as it stands is still quite siloed in its approach. There has not yet been enough collaboration across Government and across domains, so there are definitely opportunities to do more.

48. The Committee highlights concerns raised in oral and written evidence that the Plan remains "quite siloed" in its approach and lacks the necessary detail concerning mechanisms that will foster the level of cross-sector and cross-portfolio collaboration necessary to deliver its outcomes. The Committee concludes that the Plan should demonstrate more clearly how the Scottish Government will lead this work.

## Local translation

49. While there is not yet a requirement to produce local plans, sections of the Act, once commenced, will create that duty for local authorities and health boards (but not integration joint boards or other bodies).
50. East Renfrewshire Council raised concerns, based on previous experience about the gap between national leadership and local autonomy and the potential for conflict and misalignment of policy and action:
- ” We are concerned about how the national plan will be translated into local action, especially given the wide-ranging themes such as Food Production and Processing. National directives often duplicate or conflict with each other, creating implementation challenges at the local level. Moreover, national priorities may not always align with those identified through local stakeholder and community engagement, yet require significant resources to deliver.
51. Giving oral evidence, Anna Chworow highlighted a potential risk of conflict between the goals set out in the proposed national plan and those to be set out subsequently in local plans and reiterated the need for greater collaboration to overcome this:

- ” What is quite confusing in the national plan is that although it says that local authorities need to have regard to the outcomes that are specified in the plan, they can also come up with their own outcomes and priorities. That is the kind of contradictory guidance that is not helpful. There needs to be more collaboration, whether it is with the food commission, or whether it is a dialogue between the Scottish Government and the Convention of Scottish Local Authorities or, more widely, with local authorities and health boards.

52. The Committee highlights stakeholder concerns about the potential for conflict between national outcomes and priorities as set out in this Plan and those outcomes and priorities to be subsequently developed in local (local authority and health board) plans, informed by local circumstances. It further highlights the need for further collaboration and dialogue between the Scottish Government and those responsible for developing local plans to ensure proper coordination of national and local priorities and to avoid the risk of national and local plans conflicting with one another.

## Improved public health

53. The Plan acknowledges the challenges entailed in system-wide reform, but presents a starting point for policy teams and stakeholders to start to work across all food policy-related areas. Submissions to the call for views highlight some of the potential challenges for progress, including competing priorities in different areas, such as economic development, for example:
- High value, high provenance Scottish produce that goes for export can become expensive to buy in Scotland
  - Meat production adds to greenhouse gases, but is a key aspect of Scottish agriculture, and many vegan foods are ultra-processed.
  - Whisky is a major feature of the food and drink industry, but causes health harms.
  - Tackling obesity requires commitment and collaboration between policy makers and across manufacturing, retail and processing, and across all UK nations.
54. Part Two of the Plan, ‘A Practical Approach to Implementation’, suggests that some of the barriers to implementation exist because of the way the Scottish Government is organised. The Plan lists a long ‘condensed summary’ of all the Directorates involved, along with the associated policy areas. It also provides a section on links to current strategic overarching policies across government (pp19-21). The Plan does not introduce or suggest new policy directions.
55. In its response to the call for views, Public Health Scotland argued:

- ” The Plan would benefit from outlining how these different areas will work together to achieve GFN outcomes and further outlining, in greater detail, the process for cross policy work and how engagement with stakeholders will be undertaken.

56. The Committee calls on the Scottish Government to set out what mechanisms it will put in place to ensure competing priorities in different areas, as highlighted in written and oral evidence, do not result in policy inertia or inhibit realisation of the Plan's stated outcomes.

# Population Health Framework 2025-2035

57. Like the Plan, the [Public Health Framework](#) sets out a vision and a 'broad range of actions that seek to tackle the drivers of ill health'. The aim of the Framework is to improve the stalled Scottish life expectancy whilst reducing the life expectancy gap between the most deprived 20% of local areas and the national average, by 2035.
58. In terms of food, the aim is to 'publish at two-year implementation plan of preventative action to improve the food environment, diet and healthy weight.' Improving healthy weight is one of two key initial priorities, along with 'embedding prevention in our systems'.
59. According to the Proposed Plan:
- ” The National Good Food Nation Plan aligns closely with the Population Health Framework. A better food system is integral to improving population health in Scotland and reducing health inequalities. This plan provides a cross-policy approach to ensuring the collective action required, complementing and supporting the wide range of actions under the Population Health Framework.
60. A number of submissions to the Committees' call for views mentioned the Population Health Framework in connection with the GFN Plan, focusing on related themes. For example, the Care Inspectorate highlighted in written submission that the focus on BMI as a measure, and the focus on obesity, should be reviewed because of known issues about its validity. The organisation Food Train also highlighted the problem of malnutrition in the elderly population, stating:
- ” While sub-outcome 3B ('Adults and children have a healthy weight and inequalities in healthy weight outcomes at a population level are narrowed') details goals for a healthy weight it is clearly only focussing on those with a higher BMI & those who are overweight or obese. This focus neglects those at risk of or suffering from malnutrition. This is a concern for older people due to the disproportionate amount of older people in Scotland who are at risk of malnutrition compared to the rest of the population. Measuring BMI alone won't capture those who have limited access to food, are struggling to eat through poor appetite or are at risk of sarcopenic obesity through malnutrition.
61. Giving oral evidence, Anna Chworow from Nourish Scotland acknowledged the Plan's overarching focus on tackling overweight and obesity but suggested other aspects of poor diet affecting a range of demographics also needed to be considered:
- ” In all of the policies, there is a focus on healthy weight, which recognises the questions of malnutrition and eating disorders, which you mentioned. However, in practice, when we hear that term, we still think about overweight and obesity, so we are not considering those other ends of the spectrum sufficiently. That is particularly the case with malnutrition in older age groups, where we are actually probably more concerned with people eating enough rather than eating too much.
62. Commenting on the same sub-outcome, the Scottish Alliance for Food (SCAF) argued:

” It would be useful to see a more diversified set of measures being considered - for example, waist circumference is a stronger, more reliable measure of obesity-mediated disease risk.

63. The Scottish Directors of Public Health Group (SDsPH) and Public Health Nutrition Group (PHNG) welcomed the plan, but also argued that the narrative about obesity and weight needs to change, stating:

” This means shifting the narrative from individual responsibility to the environmental, broader building blocks for health to enhance public understanding and build consensus for societal action. Consideration of how weight is used as an indicator in the proposed plan needs to be taken into account, to ensure that this does not move focus away from a whole system approach to healthy weight and risk bringing focus back to individuals.

64. NHS Lothian Public Health questioned why an emphasis on the economic importance of Scotland's drinks industry is included in the Plan and highlights this as one of the areas where competing or conflicting policy might cause issues for implementation or agreement.

They argue the Plan should address these concerns:

” The tension between a food policy and a food and drink policy remains unresolved in the plan. This is most apparent in the Outcome 3 indicators section. None of these indicators address the significant health problems in Scotland caused by excess alcohol supply and consumption.

Elsewhere the Good Food Nation Plan highlights the importance of the drink industry, which suggests that government policy prioritises the economic benefits claimed for the alcohol industry rather than reducing the health harms linked to alcohol. As the Good Food Nation (Scotland) Act 2022 does not include a single mention of the word drink or alcohol, it is unclear why drink – specifically alcohol – needs to be included in this plan.

65. In oral evidence, Professor Lindsay Jaacks echoed these concerns:

” ... I thank you for mentioning the health-harming products that are referred to in the population health framework. Alcohol is mentioned there, yet the good food nation plan continues to mention “drink” multiple times, particularly in outcome 4.

66. Anna Chworow from Nourish Scotland expressed concern that the Plan was primarily focused on the food sector's contribution to economic growth rather than addressing the sector's role in contributing to health and sustainability goals. By contrast, she pointed to the collaboration with supermarkets on supporting healthy consumption that is encouraged by the Population Health Framework:

” The population health framework, which involves some joined-up working with retailers, supports that, but the plan itself does not. I also think that it would be helpful if outcome 4 specifically talked about the role of the food sector in relation to delivering health and sustainability outcomes and not merely in relation to growing the economy. There needs to be more joined-up thinking there as well.

67. Age Scotland highlighted, in written evidence, ethnic minority considerations in risk factors, similar to the submission from Dubiel which addressed access to healthy food for different demographics (and intersecting demographics) such as ethnic minority low-income households.

FOUR PAWS UK argued that the Plan should be founded on the principle of food justice:

” Access to healthy, affordable, culturally appropriate food should be treated as a right, not a privilege. Current inequalities in food access, diet-related health outcomes, and exposure to poor-quality food must be actively redressed through the Plan.

68. In oral evidence, Clare Hislop from Public Health Scotland argued that any indicators developed to support the Population Health Framework should be reflected in the proposed national GFN Plan and that this would help to ensure consistency while reducing the overall administrative workload of data collection:

” One thing that we are keen to have, which we mentioned in our consultation response, is a set of indicators that can be used across different policies. For example, if we have indicators to support the population health framework, it would be good to see them reflected in the good food nation plan, too. When we are monitoring those indicators, we are actually looking at making a system-wide change happen across Scotland. Having such indicators would be beneficial because it would reduce the burden of reporting on different things for local authorities and health boards, as well as following the Government plan.

69. The Committee highlights stakeholder concerns that the Plan's focus on tackling obesity and overweight, and how this is measured, needs to be carefully considered in the context of many individuals, particularly in older demographics, who may be suffering from malnutrition. It calls on the Scottish Government, in finalising the Plan, to make every effort to ensure that its primary focus remains on addressing the whole food environment rather than placing the onus on individual behaviour.
70. The Committee highlights the important responsibilities the food industry has in contributing actively to the delivery of health and sustainability outcomes.
71. The Committee draws attention to calls from stakeholders for the Plan to shift its focus on the role of the food industry in delivering a Good Food Nation from one that primarily emphasises the industry's economic contribution towards one that emphasises its contribution towards delivering health and sustainability outcomes. The Committee calls on the Scottish Government, in responding to this report, to address these concerns directly.
72. The Committee highlights the need for greater consistency in the use of indicators across multiple policy frameworks, notably the Plan currently under scrutiny and the Population Health Framework. It believes this will help to ensure a unity of purpose towards creating a Good Food Nation across these different frameworks, as well as reducing unnecessary administrative burden on those responsible for monitoring progress.

## Common themes raised in evidence

73. While the above sections covered some specific concerns raised in the broad sense, there were a number of more specific concerns arising from written submissions to the Committee's Call for Views and subsequently touched on in the Committee's oral evidence sessions.

### Food education and cooking skills

74. Education about food and nutrition was raised in many submissions. Nourish Scotland raise this issue in relation to both school and post-school education:

” We note that education is one of key areas within the scope of the Act. In this respect, we would like to see action on aligning vocational training for chefs with the “One Health” approach; revising of the agricultural curriculum and development of sustained knowledge sharing opportunities for farmers to advance transition to agroecology; development of horticulture training; and an introduction of Higher in food system studies as part of the school curriculum.

Dubiel argued similarly, stating:

” The Plan should support the integration of food growing into school curriculums (sic), care services, and public health programmes to promote skills, wellbeing, and lifelong healthy habits.

75. Aberdeenshire Council flagged the importance of education, stating:

” Education right from pre-school level is a key contributing factor when it comes to knowing what food and activities can mean in relation to “Healthy Living”.

76. NHS Greater Glasgow and Clyde and the Glasgow Food Policy Partnership suggested outcomes could be strengthened around education:

” Whilst outcome 5B.2 provides useful information about the Food for Thought Education Fund, the Plan misses the opportunity to strengthen the importance and role of the curriculum in delivering food education and the impact it could have on both population food literacy and cooking skills as well as creating skills for employment within the hospitality and food and drink sectors – which would also impact positively on outcome 4 to improve the quality and reputation of Scottish restaurants, hotels and businesses.

77. Stakeholders giving oral evidence argued that, rather than focusing on education, there was a need for the Plan to place a greater emphasis on changing the food environment. Professor Lindsay Jaacks from the University of Edinburgh told the Committee:

” Educating people, including kids, about food puts the onus for change on individuals. The food environment needs to change, and eating a healthy and sustainable diet needs to be convenient and the default option. It should not be up to consumers to know what is healthy and sustainable and to choose, and be able to afford, that food. It needs to be the default.

78. Witnesses also argued that placing undue focus on education in the Plan ignores the reality that most people are already well-educated about food and cooking. Anna Chworow told the Committee:

” There is interesting research that shows that people’s food literacy and confidence in being able to cook at home is really high—it is more than 90 per cent—so we do not need to focus on education.

Anna Chworow concluded:

” I absolutely agree that we need to focus on the environment that we live in, as opposed to individual behaviour.

79. Later in her oral evidence, Lindsay Jaacks expanded further on her earlier comments by focusing on the importance of convenience:

” Whether convenient food is a ready meal or it is popping into a local community diner and having food with your neighbours, those things could both be considered convenient, but they have very different food cultures underlying them, and they could have different health and sustainability implications.

Convenience needs to stay in the food system—that is what consumers want. However, what is convenient is open to interpretation—it does not have to be an ultra-processed ready meal.

80. Building further on the idea of supporting approaches that can change the food environment by placing an emphasis on convenience in promoting healthier eating options, Anna Chworow highlighted examples of community dining that have been successfully implemented in other countries:

” On Lindsay Jaacks’s point about community diners, that is how some other countries are dealing with the problem—or how they are dealing with the simple question of people seeking convenience in busy and complicated lives. They are rolling out chains of state-supported restaurants, public diners and public restaurants. We see examples in Turkey, Poland, China, Brazil and Mexico, where Governments are taking a more imaginative and bolder approach. They are trying to reshape the food culture and the food environment but not work against the fact that people are seeking convenience or are trying to manage competing demands.

81. The Committee acknowledges a range of views on the issue of food education. It further acknowledges the concerns expressed by certain witnesses in oral evidence that placing an undue focus on developing cooking skills risks shifting the onus of the Plan from tackling the wider food environment towards an emphasis on addressing individual behaviour. At the same time, the Committee firmly believes there is an important role for education in shifting broader attitudes to food and food culture and that this must be seen in the context of addressing wider barriers to healthy, sustainable, affordable and convenient food choices..

82. The Committee recognises the importance of convenience in modern society and the need, in that context, for healthy and sustainable food options to be convenient for the vision of a Good Food Nation to be successfully realised in

Scotland. It has therefore been particularly interested to learn of examples of the development of community diners as a means of giving people easier and more convenient access to affordable, locally sourced, healthy and sustainable food. The Committee recognises ongoing work to explore the development of similar schemes in Scotland and calls on the Scottish Government to commit the resources necessary to support their more strategic and systematic implementation as part of the Plan.

## Food in health and social care settings

83. The Care Inspectorate submitted detailed views on different parts of the Plan, but they particularly highlight the need for more specific reference to the social care sector in some of the narrative and detail, such as ensuring that the prioritising of good food in the public sector includes private providers of care and a reference to the Health and Social Care Standards. They ask that social care providers are included as 'Actors in the Food System', and that language around accessibility to good food takes account of those in care home settings.
84. The points raised by the Care Inspectorate link back to Food Train's concerns about the perceived lack of detail around targets around older people in the Plan. They ask for an indicator related to the prevalence of malnutrition to be included in the Plan, and training about malnutrition for those working in the care sector.
85. Scottish Food Coalition refer more generally to food insecurity, but highlight that this particularly affects older people and social care staff:

” We welcome the mention of improving nutritional care in all care settings including hospitals and care homes but would like to see more recognition of the reality of food insecurity for many vulnerable groups, including older people and social care staff, and the systemic issues that affect adequate food access.

86. The Committee is firmly of the view that, for a Good Food Nation to be successfully realised, the health and social care sectors will need to be involved as equal partners in the development and delivery of national and local plans, both as procurers of food for patients and residents, but also with respect to addressing wider public health concerns.

## School meals and early years nutrition

87. A range of submissions also included views on school meal provision, and early years nutrition, particularly breastfeeding. For example, Scottish Food Coalition argued:

- ” We would like the Plan to show a commitment to early years nutrition, including increased support and initiatives to keep raising breastfeeding rates, where appropriate and desirable, which would provide both nutritional and developmental benefits for infants and lower risks of cancers and chronic diseases in mothers.

Aligned to this we support the call by colleagues at ASSIST FM, amongst others, for Universal Free School Meals (UFSM) to be extended to all Primary and Secondary pupils, especially given the strong evidence that this supports public health, reducing poverty and equality.

88. East Ayrshire Council highlighted its commitment to fund free school meals to all primary school pupils as part of its early intervention and prevention activity. Their decision follows a pilot providing half price meals to all primary and secondary pupils, which saw uptake increase. They stated:

- ” Our Council is in a strong position to take this activity forward. The school meals service in East Ayrshire has received significant recognition for the innovative and responsive approach to delivering the service. Across East Ayrshire, pupils continue to enjoy high-quality and sustainable meals.

89. The submission from NASUWT highlighted that the Union has been calling for UFSM expansion, particularly as a tool to mitigate the cost of living crisis in Scotland. They flagged that:

- ” Poverty isn't always seen and those experiencing poverty are not always eligible for free school meals; therefore, expansion of entitlement is particularly important when many families are experiencing in-work poverty or where income may fluctuate due to insecurity of work. And indeed, even for those who are eligible, many do not wish to claim because of persistent issues around stigma, shame and accessibility.

There remains a real opportunity for the Scottish Parliament to do something transformative, to normalise universality and to ensure both access to nutritious food and a positive culture around food are embedded within Scottish education and society more broadly.

90. In oral evidence, Professor Lindsay Jaacks from the University of Edinburgh also highlighted the potential benefits in delivering the Plan's goals of a wider roll-out of UFSM:

- ” We were very supportive of the other responses that said that an extension of universal free school meals to all primary and secondary school students should be explored, because that could have a significant impact on long-term trajectories towards healthy diets.

91. South Lanarkshire Council would like “the Plan to show a commitment to early years nutrition, including increased support and initiatives to keep raising breastfeeding rates”, and Obesity Action Scotland questioned why there is nothing in the Plan on limiting the advertising and promotion of formula milk.

92. In oral evidence, Mhairi Brown from the Food, Farming and Countryside Commission Scotland argued there should be a focus in the Plan on monitoring

availability of fast food and healthier alternatives around schools:

” There is also a case for having clear indicators on the prevalence of fast food outlets and how close those are to schools, and what foods are available around schools.

93. Professor Lindsay Jaacks from the University of Edinburgh suggested addressing the widespread availability of fast food around schools would require a variety of actions within the Plan:

” As far as I am aware, takeaway management zones have been implemented only in England to date. However, the national planning framework will enable similar things to happen in Scotland. The evidence from England shows that the zones are very effective in preventing takeaways from popping up around schools, or mitigating the effect of that.

However, if your school is already in what we call a food swamp, which is the opposite of a food desert—it is a place with loads of really unhealthy, cheap food—you cannot really address that, because policies such as the management zones do not address existing takeaways in the area, just the development of new ones.

There is not very much there. The frameworks from Public Health Scotland and Food Standards Scotland about eating out and about working with takeaways to make food healthier are one solution. The other solution is to make staying at school a more feasible option because of the time that pupils have and to make it more desirable to consume meals at school. We know that school meals are healthy, because they meet the standards that have been outlined.

94. The Committee recognises the pivotal role of schools in fostering healthy eating at an early age and in delivering a Good Food Nation. In this context, it notes widespread support in oral and written evidence for the wider roll-out of universal free school meals. It also recognises that planning policy, collaboration with food outlets located in the vicinity of schools and making staying in school over lunchtime a more attractive option all have a role to play in improving children's nutritional health.

## 'One health' approach

95. A number of organisations responded to the call for views describing and advocating for a 'one health' approach, which acknowledges the intrinsic links between public health and wellbeing, other animals and the environment. They cite the shared challenges as evidence for a change in focus, such as zoonotic disease, antimicrobial resistance and the impacts of climate change.

96. The Scottish Food Coalition argues that a 'One Health' approach could be unifying for the Plan as an integrated, well-aligned intersectional approach, further stating:

” In addition, by addressing health risks holistically, it supports better health outcomes overall, for example for workers in industries such as agriculture, aquaculture and animal husbandry. This integrated approach aligns well with Scotland’s Good Food Nation ambitions for sustainable public health, social well-being, animal welfare, fair work and environmental stewardship, ensuring that policies and services work together to protect and improve the health of current and future generations. Given this alignment in systemic perspectives, and the fact that poor diets are one of the main causes of preventable ill health and death in Scotland, we believe the Population Health Directorate is best placed to lead the Good Food Nation work.

97. It is worth noting that, under Primary Indicator 2A.4 ‘Climate adaptation in the context of our food system’, the Plan states:

” As climate adaptation is a multi-faceted and complex issue, we have not identified a primary data indicator that would be practicable to monitor the overall resilience of Scotland’s food system to climate change risks.

98. In oral evidence, Anna Chworow from Nourish Scotland suggested that, in her view, the Plan currently places too little emphasis on a ‘One health’ approach:

” You mentioned the one health approach, which includes looking at the health of the planet and the transition that we need to make towards eating more plant-based diets. There is a general consensus on that and some countries are moving at a much faster pace than we are. The plan has not paid any attention to that really crucial question, but we should be doing that.

99. To support a ‘One health’ approach, Anna Chworow went on to argue there should be a greater focus in the Plan on encouraging a more sustainable approach to food production:

” It would serve us well to look at production and link that a bit more to the dietary guidelines. That would mean producing more pulses, fruit and vegetables and allowing the farm subsidy scheme to really bolster the production of those types of food, which we need to be eating more of, when at the moment a lot of our subsidy goes to the production of red meat and crops for alcohol. That is one of the areas in the plan in which there is not yet enough of a joined-up approach between different outcomes and Government departments.

100. The Committee highlights stakeholder calls for the Plan to place a greater emphasis on a ‘One health’ approach towards creating a Good Food Nation. It further notes evidence that, for this to be achieved, there will be a need for a wide range of policy areas, and particularly food production, to be better aligned towards collectively meeting the goals that underpin a ‘One health’ approach.

101. The Committee also notes the Plan does not yet address some of the inherent problematic issues arising from the food and drink industry. It calls on the Scottish Government to respond to evidence it has heard about the potential public health impact of health-harming products such as alcohol, and levels of consumption of red and processed meats.

## Food environment and Ultra-Processed Foods (UPFs)

102. A number of submissions state the need for more reference to UPFs in the Plan.

103. The Royal College of Paediatrics and Child Health Scotland (RCPCHS) include a section on this issue in their submission and make several recommendations:

” We recommend that the Plan explicitly address the growing body of evidence linking high consumption of Ultra-Processed Foods (UPFs) to adverse health outcomes, including obesity, cardiovascular disease, and mental health challenges in children and young people.

While we recognise that some UPFs serve important roles in specialist diets, such as gluten-free products for coeliac disease or fortified foods for nutritional support, many UPFs contain excessive levels of fat, salt, and sugar. These products are typically energy-dense and nutrient-poor, contributing to poor dietary quality and long-term health risks.

Specifically, we recommend:

- Including UPF consumption as a monitored dietary indicator.
- Developing public health messaging and education campaigns to raise awareness of UPFs and promote whole, minimally processed foods.
- Exploring regulatory measures to reduce the availability and promotion of UPFs, particularly to children

104. In their response to the call for views, the Scottish Crofting Federation address UPF in the context of local sourcing of fresh food and relocalising supply chains. They argue that the rise in consumption of UPFs has grown hand in hand with growing reliance on large supermarket chains and all that entails for local production infrastructure.

105. The Scottish Food Coalition believes there is an opportunity to review the Scottish Dietary Goals in recognition of the negative impact of diets high in UPFs, particularly those associated with high fats, salt and sugar. The Food and Drink Federation Scotland highlighted the Reformul8 Partnership which, it states, ‘has removed billions of calories and tonnes of salt and sugar from Scotland’s everyday foods’.

106. Professor Lindsay Jaacks from the University of Edinburgh told the Committee that more research was needed into ultra-processed foods before any firm conclusions could be drawn about their impact:

” ... I do not think that the plan is lacking in this regard—yet. I will probably not be saying the same thing in five years’ time but, for now, because I do not know how to define UPFs appropriately to give advice to people, I do not feel comfortable with having regulations and policies in place. It is very hard to define what ultra-processed food is from a scientific standpoint.

107. At the same time, Professor Jaacks also raised concerns elsewhere in her oral

evidence about the ways in which an inherent power imbalance within the food 21 Report on the Proposed National Good Food Nation Plan system resulted in consumption of ultra-processed foods being actively promoted in spite of their multiple negative impacts:

” My major concern around ultra-processed foods comes back to the issue that was mentioned earlier about power in the food system, which is something that is not often explored. The issue with UPFs is about not just their health impacts or, for that matter, environmental impacts but the power dynamics and how approaches to reformulation and so on keep the power with multinational companies.

108. The Committee is firmly of the view that, in light of emerging evidence of their negative impact, a clear and comprehensive definition of ultra-high-processed foods and ultra-processed foods is urgently needed. It further believes that policy development in this area needs to be led by public health interest rather than the economic interests of the food industry. In this context, it calls on the Scottish Government to keep this area under active review and to be ready to incorporate any agreed policy response into future iterations of the Plan.

## Equity of access to nutritious food

109. Submissions to the Committee’s call for views address the issue of access to food in different ways: food insecurity, child poverty and access to a range of shops versus a single convenience store for example.
110. The organisation Which? provided a response to the Call for Views describing a range of research it has carried out. They highlighted work in collaboration with University of Leeds to develop the [Priority Places for Food Index](#), which brings together a range of indicators for food insecurity such as financial vulnerability and physical access as well as the location and type of food outlets.
111. They also highlighted the study carried out by the University of Leeds on [commercial baby foods](#).

The Technical report provides recommendations for policy makers as well as retailers and manufacturers. The study found that many products were very high in sugars, portion sizes were excessive, and the nutritional value was very variable, depending on the amount of water making up the product, and that protein levels were low. Misleading product names and nutrition claims were widespread. They point out that this makes it difficult for the public to know what their very young children are consuming. They also argue that health inequalities could be exacerbated as parents in more deprived areas are more likely to depend on those products tested as part of the study

112. The RCPCHS argues that, as affordability is one of the main barriers to accessing health and nutritious food, references to that link should be strengthened in the Plan.

113. Food Poverty Action Aberdeen called for more indicators around food insecurity which link directly to poverty alleviation and income maximisation, employment, skills development. They believe the [Food Ladders framework](#) provides an opportunity to tackle food poverty by harnessing community assets and resilience through food focused community food initiatives.

114. The Committee recognises the critical importance of delivering equity of access to nutritious food across the Scottish population as a fundamental prerequisite for achieving a Good Food Nation. In this context, it highlights stakeholder views that the Plan should place greater emphasis on monitoring levels of food insecurity as a mechanism for measuring the Plan's success in overcoming unequal access to nutritious food.

## Procurement, supply chain reform and the food industry

115. The Act places no specific requirements on the food industry, be that manufacturing or retail. Instead, the requirements in the Act are that national and local plans and implementation of policies are informed by the food business sector.

Section 2 of the Act lists principles to be followed in the preparation of the National Plan. 2e states:

” In preparing the national good food nation plan, the Scottish Ministers must have regard to— “2(e) the importance of the food business sector— (i) continuing to be a thriving part of the Scottish economy, (ii) having resilient supply chains, (iii) operating with fair work standards, and (iv) in contributing to resilient local economies across Scotland.

116. The Food, Farming and Countryside Commission argued in their written submission that:

” [...] recent investigations show food businesses have 40 times more ministerial access than public health groups, using systematic 'tobacco playbook' tactics to deny evidence, dilute policies, and delay implementation. The ultra processed food industry has successfully blocked government plans to encourage retailers to promote minimally processed foods.

FFCC's commissioned analysis *The False Economy of Big Food* shows diet related diseases cost £268bn annually across the UK versus £57bn needed for everyone to eat well. This represents a fundamental economic case for intervention, yet corporate influence prevents necessary action.

They go on to make a number of recommendations including the addition of corporate accountability indicators, a shift in focus from individual measurement and 'consumer behaviour to the tracking of systemic changes in food retail environments, advertising exposure, and corporate pricing practices that actually influence food access and choice'.

117. Public sector procurement was one of the main areas of focus for the Local Government, Housing and Planning Committee’s scrutiny of the Plan, which ran concurrently with this Committee’s scrutiny.

In this context, Scotland Excel recommend increased investment in capacity and innovation:

” 4. Delivering improved health outcomes through food procurement will require investment in market development, supplier engagement, and training for public sector buyers. The final Plan should commit to supporting innovation in food services (e.g., locally prepared meals, community kitchens, or circular food systems) that can deliver both health and social care benefits.

5. Monitoring Impact on Health and Care Outcomes: The Plan should include mechanisms for assessing how food procurement decisions contribute to improved health outcomes—particularly in vulnerable groups such as older adults, people in care settings, and those experiencing food insecurity. Scotland Excel will monitor impact on sourcing patterns.

By reflecting these changes, the final Good Food Nation Plan would more effectively connect food procurement to Scotland’s public health and social care ambitions.”

118. The submission on behalf of Scottish Directors of Public Health also provided their view on NHS procurement, stating:

” There should be clear, practical guidance from Scottish Government on how to embed Good Food Nation principles into procurement without breaching existing regulations.

The ability to prioritise local, sustainable and ethical food is essential. NHS procurement needs to move as much as possible away from national contracts and towards local health boards being able to purchase locally – supporting local food businesses and local community wealth building. It is recognised that high quality sustainable foods often have a greater financial cost. Dedicated funding or financial incentives would support to make procurement decisions based on the values of the Good Food Nation Plan. Investment in local food networks and support for small suppliers would also support the necessary infrastructure and coordination to source local and seasonal foods. Local procurement policies should include nutritional quality as a key criterion, not just cost or convenience. It is important for the public sector to lead by example and prioritise procuring food that is local, seasonal, healthy and sustainable, supporting Scottish agriculture and reducing environmental impact. SMEs must be supported to be able to engage in tender opportunities.

119. The Committee highlights stakeholder evidence in favour of creating clear guidance for public bodies to ensure Good Food Nation principles are effectively embedded into food procurement practices. It calls on the Scottish Government to provide a commitment that this will be a core component of the Plan's implementation.

## Mental health, the third sector and social wellbeing

120. Public Health Scotland's submission summarises views expressed in a number of responses in relation to the third sector, stating:

” We welcome the inclusion of community food organisations as one of the many actors in the food system to support a GFN (page 9). However, we would suggest that the Plan recognises that food is integral to a range of community and voluntary sector organisations, not just those focused solely on food or food growing (such as those indicated in Part One – What will a Good Food Nation Look Like?, Paragraph 5, page 4). For example, SCVO reports that there are over 46,500 voluntary organisations in Scotland and in a typical year 4 in very 5 households will use a voluntary service [ref 17]. Many of these are likely to provide services such as community cafes, food growing, meal services for older people, or run ad hoc food activities, such as cooking, food safety training, snack provision etc as part of wider activities, offering an opportunity to support a Good Food culture.

To reflect the vital contribution of the community and voluntary sector, we recommend the Plan clearly outlines how it has engaged - and will continue to engage, the sector. We recommend the Plan emphasises the need for community and voluntary sector involvement in local food plans, which will encourage partnership working across local systems.

121. In oral evidence, Claire Hislop from Public Health Scotland reiterated this view and emphasised the importance of fair funding models for third sector organisations:

” A lot of our third sector partners are on very short-term funding models, which makes it difficult for them to hire staff or make long-term plans or sustainable change. Building in fair funding models would enable them to be much more proactive.

Those are long-term plans and we will not see a difference overnight, so we must think about the infrastructure to make that work. Our third sector will, inevitably, be able to get to people that we will not reach, so it is critical for public bodies to ensure that we give it the necessary support to enable that to happen.

122. Many respondents referred to mental health in connection to the Plan. One individual, Mr G Robertson argued that the Plan should be strengthened by, among other things:

” Recognising the mental health burden of food insecurity, and addressing the link between poor diet and rising dependency on antidepressants and opioids... I also call for the Plan to support community prescribing schemes that provide fresh food boxes or subsidised meals as part of post-hospital recovery, mental health support, and addiction services. Patients should not be discharged into malnutrition or unsupported eating environments.

123. Similarly, SCAF highlighted the lifelong impact food insecurity can have if a mother cannot access healthy food for her or her children, directing their response towards the outcomes, stating:

” Outcome 1, indicator 1A2 which focuses on the individual level of food insecurity, an important marker of a lived experience with deep lifelong repercussions – at the psychosocial but also biochemical/physiological level. Given the important repercussions of food insecurity peri-pregnancy on mother and child, granular data across the lifecycle will be important to capture, disaggregating food insecurity data in pregnancy and during lactation, specifically.

124. Age Scotland highlighted that there is strong evidence to support the development of a food system that promotes communal eating and that this provides a real contribution to positive mental health:

” We would see reduction in levels of loneliness in older people and improved mental health outcomes in areas where lunch clubs, day centres and communal dining places for older people have been sustained or increased, via data from the Scottish Government, Scottish Health Survey; knowledge from local authorities; Age Scotland membership data; as well as data from Age Scotland’s bi-annual Big Survey.

They agree with the Scottish Food Coalition’s manifesto recommendation to ‘invest in public food and local food economies, such as public social dining spaces – ‘public diners’ - which can serve as hubs for social connection, health support, welfare advice and wellbeing.

125. In oral evidence, Claire Hislop from Public Health Scotland agreed that a greater emphasis on mental health throughout the Plan would be welcome:

” Mental health is one of the outcomes, but we would like to see that filter throughout the plan. Food has an impact on our wellbeing, and food insecurity has an impact and affects people with poorly paid jobs. We would like to see that covered in the plan and are looking for indicators that would show changes to those aspects.

Mental health is important to our wellbeing, and there are many opportunities in the food environment to boost our mental wellbeing.

126. Mhairi Brown from the Food, Farming and Countryside Commission Scotland argued that considerations around mental health should be expanded to address the needs of those working in third sector organisations to provide communities with healthier and more sustainable food:

” Any reference to mental health should be not only for the people who are accessing food but for those in community food settings who are working many unpaid hours and facing burnout and should ensure that there is more support for the third sector in general within the plan. That is crucial and would have benefits across the sector.

127. The Committee recognises the critical role third sector organisations play in delivering many successful community initiatives to promote access to, and growing of affordable, locally sourced, healthy and sustainable food. It further recognises calls in evidence for a commitment to fair funding to give these

organisations the confidence to plan and invest long-term in the continued delivery of these initiatives.

128. The Committee recognises the huge potential for improvements to Scotland's food environment to have significant benefits to our mental health. It highlights stakeholder evidence arguing for a greater emphasis in the Plan on indicators related to mental health as an important measure of its successful implementation. It further notes that the positive mental health impacts of access to good food, eating together and growing food are well-evidenced.

## Plans for implementation

129. The sections of the Act requiring health boards and local authorities to prepare their own Good Food Nation Plans have not yet commenced, which, when done, will start the clock for these bodies to produce the plans.
130. The Scottish Government stated in the Plan that they recognise the complexity and multi-faceted nature of these local plans given the need to consider food across a number of separate remits. However, as highlighted earlier in the report, some have stated there is a potential risk that local plans might not correlate with the National Plan or with other local plans and priorities.

# Proposals for measuring progress

131. The Good Food Nation Act includes two accountability mechanisms to ensure a ‘joined-up’ approach and policy coherence -
1. An independent Scottish Food Commission, whose functions are to keep Plans’ progress and effectiveness under review, and advise, inform, and assist Ministers and relevant authorities. The first Chair of the Commission, Dennis Overton, was appointed in August 2024, and joined by another three board members in June 2025. At time of writing, recruitment for a Chief Executive was underway, with the Commission expected to begin exercising its functions once the first National Good Food Nation Plan is published by the end of 2025.
  2. A duty on Scottish Ministers and relevant authorities to have regard<sup>1</sup> to the Plans “when exercising a specified function or a function falling within a specified description” (Section 6). Functions here can be either a power or a duty, and will be set out in regulations. Note: this is the first time that such provision has been used in Scottish legislation. It was preferred to a general “have regard duty” to avoid placing unnecessary requirements on policy areas that do not deal with food-related policy. The first regulations setting out the specified functions for Ministers are expected to be laid before Parliament in autumn 2025 and will be subjected to the affirmative procedure.

There is also a duty to report on the plan every two years.

132. According to the Plan, the Scottish Food Commission ‘will review progress and effectiveness of national and relevant authorities’ Good Food Nation Plans. It will advise, inform and assist the Scottish Ministers and relevant authorities with a view to promoting and supporting progress to achieve the outcomes and also improving the effectiveness of the plans in addressing food related issues.’
133. The Plan does not elaborate further on the potential or role of the Commission. the Plan mainly provides narrative about targets, indicators and measuring progress. Targets are existing ones, for example about healthy weight and food waste. It states that an appropriate monitoring framework could ‘establish a baseline level of performance for our food system relative to our outcomes.’ Baseline data will be set from 2025, but some indicators will be subject to different, non-annual reporting cycles:
- ” The monitoring framework consists of several high-level data-driven primary indicators that relate to each outcome. Our primary indicators are drawn from a range of sources but are primarily from existing official statistics produced elsewhere across the public sector that intersect with food policy and the Good Food Nation Outcomes (i.e. poverty, health, environmental, and economic statistics).
134. Witnesses giving oral evidence to the Committee were in general agreement that more detail was required in the Plan about the purpose and role of the Scottish Food Commission. Professor Lindsay Jaacks from the University of Edinburgh argued this was particularly important in the area of monitoring and data:

” It would be useful to have clarity about the role of the new Scottish food commission in monitoring, particularly with regard to data. That is true at both national and local authority level.

She went on to emphasise the need for more detail around how the Commission would collaborate with other organisations:

” ... in general, we need much more information about what the commission will do and about its interaction with other public bodies and local authorities.

135. While welcoming the proposed creation of a Scottish Food Commission, Claire Hislop from Public Health Scotland echoed the need for more clarity concerning the relationship between the Commission and other bodies:

” Accountability is key to driving things forward and we are keen to understand how the commission will work with others to make recommendations and to know where the evidence base will be. Public Health Scotland is committed to supporting that, but it would be good to outline how the commission will work with us and with other stakeholders to enable that to happen.

136. Mhairi Brown from the Food, Farming and Countryside Commission Scotland highlighted a lack of clarity around capacity and resourcing of the Scottish Food Commission:

” ... it is not clear to me what capacity the commission will have. There will be a chair and three commissioners, but what capacity and resources will they have and what will their scrutiny role be? Will they have the ability to convene investigations or to commission research, as required? That is not clear to me from reading the plan.

137. Reference is also made in the Plan to an indicator framework. However, along with the targets, this is characterised as merely a starting point and measuring progress against the GFN outcomes will develop further in the future.

138. Page 27 of the Plan onwards details indicators associated with the outcomes and sub-outcomes, providing reference to the sources of existing data that could be used to measure progress. The information and level of detail is comprehensive.

139. However, It is not clear, given the indication that it will not be the role of the Scottish Ministers to do anything but prepare the National Good Food Nation Plan, exactly what their role and responsibility will be in driving implementation forward.

With that said, upcoming [subordinate legislation](#) on specified functions, which is a new approach in the Act, will require reference and regard to the National Plan when carrying out a specified function. For example, regulations will either place a duty or power in connection with food related policies. The aim is to ensure food related policy and legislation is consistent with the principles and outcomes set out in the National Plan.

140. The Committee highlights widespread evidence calling for greater clarity concerning the purpose and role of the proposed Scottish Food Commission,

including in relation to monitoring and data, capacity and resourcing, lines of accountability, and how it will collaborate and interact with other bodies and decision-makers to achieve effective delivery of the Plan.

# Conclusion

141. The Committee draws its recommendations to the attention of the Scottish Government and calls on it to ensure these are suitably addressed in its preparation of the finalised national Good Food Nation Plan.

# Annexe A: Extracts from Committee minutes

This annexe sets out relevant extracts from the minutes of the Health, Social Care and Sport Committee throughout the inquiry. Each main heading links to a web-page that gives access to:

- the agenda and public papers for the meeting
- the Official Report of the meeting (public business only), and
- minutes of the meeting.

## [20th Meeting 2025, Session 6, Tuesday 24 June 2025](#)

**Good Food Nation (In Private):** The Committee considered its approach to scrutiny of the Good Food Nation proposed national plan.

The Committee agreed to issue a call for views, jointly with the Local Government, Housing and Planning Committee once the plan was laid, and to invite stakeholders and the Cabinet Secretary for Rural Affairs, Land Reform and Islands to give oral evidence in September.

## [21st Meeting, 2025, Session 6, Tuesday 2 September 2025](#)

**Good Food Nation:** The Committee took evidence from—

Claire Hislop, Organisational Lead for Food and Physical Activity, Public Health Scotland;

Professor Lindsay Jaacks, Deputy Director and Personal Chair of Global Health and Nutrition, University of Edinburgh;

Mhairi Brown, Head of Food Futures, Food, Farming and Countryside Commission Scotland;

Anna Chworow, Deputy Director, Nourish Scotland;

and then from—

Mairi Gougeon, Cabinet Secretary for Rural Affairs, Land Reform and Islands;

James Hamilton, Lawyer;

Tracy McCollin, Head of Good Food Nation Team;

Jo Mitchell, Procurement Policy Manager;

and Jules Goodlet-Rowley, Head of Tobacco, Gambling, and Diet and Healthy Weight Unit, Scottish Government.

**Good Food Nation (In Private):** The Committee considered the evidence it heard earlier in the meeting.

24th Meeting, 2025, Session 6, Tuesday 23 September 2025

**Proposed national Good Food Nation plan (In Private):** The Committee considered a draft report.

## Annexe B: Evidence

The Committee issued a joint call for views with the Health, Social Care and Sport Committee between 30 June and 15 August 2025, to which 68 responses were received. [These are published on the Parliament's website.](#)

At its meeting on the [2 September 2025](#) the Committee took oral evidence from one panel of witnesses from the following organisations:

- Public Health Scotland
- University of Edinburgh
- Food, Farming and Countryside Commission Scotland
- Nourish Scotland

The Committee also took oral evidence from the Cabinet Secretary for Rural Affairs, Land Reform and Islands, accompanied by Scottish Government, officials at this same meeting.

