

Local Government, Housing and Planning Committee  
Tuesday 9 September 2025  
22<sup>nd</sup> Meeting, 2025 (Session 6)

## Proposed National Good Food Nation Plan

### Introduction

1. Under the [Food Good Nation \(Scotland\) Act 2022](#) Scottish Ministers are required to produce a national Good Food Nation Plan which sets out its goals for food policy and how it intends to achieve them.
2. The proposed national [Good Food Nation Plan](#) was laid by the Scottish Government on the 27<sup>th</sup> June 2025.
3. At its meeting on the 24<sup>th</sup> June the Committee agreed that it would scrutinise the draft Plan from the perspective of the role of local authorities and how the Plan might progress the recommendations it had previously made in respect of the provision of allotments and growing spaces.
4. At [last week's meeting](#) the Committee heard from two panels of witnesses, comprising local authorities, Scotland Excel, ASSIST FM, Nourish Scotland, the Scottish Food Commission, and Zero Waste Scotland.
5. This week the Cabinet Secretary for Rural Affairs, Land Reform and Islands and her officials will provide evidence to the Committee on the Plan.
6. This paper provides background information to support the Committee's consideration of the proposed national [Good Food Nation Plan](#).

### A Good Food Nation

7. The Scottish Government's vision is for Scotland to be 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'. To support this, the Scottish Government introduced framework legislation in 2021 in the form of the Good Food Nation (Scotland) Bill. This was [scrutinised, amended and passed](#) by Parliament in June 2022, becoming the Good Food Nation (Scotland) Act. This included the requirement for a national plan.
8. **Annexe A** provides more detailed information on the Good Food Nation Plan and the role of local authorities.

### Parliamentary scrutiny of the proposed National Plan

9. 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".

10. The proposed plan was laid on 27<sup>th</sup> June, which means the end of the 60 day period is 29<sup>th</sup> September.
11. During this period, before finalising the 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.”
12. The Rural Affairs and Islands Committee had previously considered policy and legislation relating to a GFN. It [wrote to the LGHP Committee](#) highlighting the proposed Plan would be laid. It also indicated it did not have capacity at that time to consider the proposed Plan.

## **Scrutiny by the Local Government, Housing and Planning Committee**

13. The Local Government, Housing and Planning Committee has undertaken detailed scrutiny this session of the operation of Part 9 of the Community Empowerment Act 2015 on allotments. The [report](#) of the Committee on this work made several recommendations.
14. The Committee has continued to press the Government on these through its tracker reports. In a [letter to the Committee](#) in May the Cabinet Secretary for Finance and Local Government said:

“The forthcoming proposed National Good Food Nation Plan... includes a summary of the Scottish Government’s current allotment and community growing policy and links to one or more of the strategic, overarching Good Food Nation Outcomes which these policies support. Scottish Ministers will be required to have regard to the Plan when exercising functions specified in secondary legislation, in accordance with section 6 of the Good Food Nation (Scotland) Act 2022. Consideration is currently being given to the suitability and appropriateness of including the Scottish Minister’s legislative duties imparted by Part 9 as a specified function in forthcoming secondary legislation.”
15. The LGHP Committee agreed to scrutinise the proposed plan once laid, from the perspective of its earlier work on community growing and allotments, but also on the role of local authorities in delivering a GFN. The Health, Social Care and Sport Committee also agreed to scrutinise the proposed plan.
16. Both committees issued a joint [call for written views](#).
17. The Rural Affairs and Islands Committee also considered the Plan at its meeting on 3<sup>rd</sup> September.

18. The LGHP Committee agreed to hold an oral evidence session with stakeholders and with the Cabinet Secretary for Rural Affairs, Land Reform and Islands.

## **This meeting**

19. At this meeting, the Committee will hear from the Cabinet Secretary for Rural Affairs, Land Reform and Islands.

## **Next steps**

20. The Committee will consider the evidence it has heard during the course of its two evidence sessions on the Plan and report to Parliament on its conclusions.

**Clerks to the Committee**  
**September 2025**

## Annexe A

**SPICe**

**The Information Centre**  
An t-Ionad Fiosrachaidh

# Proposed Good Food Nation Plan

## Relevance to local government

1. The 2022 Act places requirements on local authorities (and Health Boards) to prepare and publish their own Good Food Plans. These should set out outcomes, indicators, and policies on food-related issues affecting, among other things:
  - Social and economic wellbeing
  - The environment, including climate change, wildlife and the natural environment
  - Health and physical and mental wellbeing (including through the provision of health and social care services)
  - Economic development
  - Animal welfare
  - Education
  - Child poverty
2. However [Section 10 of the Act](#), which sets out these requirements, is not yet in force. Commencement will likely be in late 2026. Local authorities will then have a year to publish plans. In preparing their plans, local authorities must publish, and consult on, a draft of their plan, and “have regard to any responses to the consultation”. They should also “have regard to the national good food nation plan”.
3. The National Outcomes, indicators, targets, and policy actions set out in the proposed National Plan provide some direction and guidance for local authorities. The intention is to ensure a coordinated approach to food policy across the country.
4. The Scottish Government says it has worked collaboratively with local authorities and health boards throughout the legislative process. To assist in writing their plans, the Scottish Government [published guidance for “relevant authorities”](#) (local authorities and health boards) in March 2025.

## Local authority food procurement

5. The Scottish Government states that “the procurement and provision of healthy, sustainable food produced in line with fair work practices is a national policy objective, and the public procurement of food is expected to be a driver for systemic change in the food sector”.
6. Local authorities spend around £83 million each year on the procurement of food, including groceries, frozen foods, meats, milk, fruit and vegetables and baked goods. This spend helps supply the products served by schools, nurseries, care homes and community centres across the country. Around 34% of this spend is on Scottish products (according to Scotland Excel).

## Procurement legislation

7. The [Procurement Reform \(Scotland\) Act 2014](#) requires that all contracting authorities (including local authorities) do not award solely on lowest price, but consider 'value for money' as expressed through the [sustainable procurement duty](#). This requires that before a contracting authority buys good or services, it must think about how it can improve the social, environmental, and economic wellbeing of the area in which it operates, with a particular focus on reducing inequality.
8. The 2014 Act is just one part of the legislative framework covering procurement in Scotland. The Act created a legal framework for [contracts below the EU thresholds](#), complementing regulations derived from EU directives on procurement. The 2014 Act places several general duties on public bodies regarding their procurement activities and places some administrative requirements on higher spending public bodies to publish procurement strategies and annual procurement reports.
9. All Scottish public bodies must consider the use of [community benefit requirements](#) for regulated procurements where the estimated value of the contract is £4 million or more. A community benefit is a contractual requirement which can relate to training and recruitment or the availability of sub-contracting opportunities. Alternatively, a community benefit can be intended to improve the economic, social, or environmental wellbeing of the authority's area. Contracting authorities must state the community benefit requirements in the contract notice, or where a requirement is not imposed must state the reasons for not doing so.
10. Contracts must be awarded through genuine and effective competition unless there are exceptional and justifiable reasons not to do so. Public bodies are responsible for identifying the most appropriate procurement process that is likely to offer the best value for money (see [scottish-procurement-policy-handbook.pdf](#)).
11. The [UK Internal Market Act](#) (UKIMA) prevents public bodies, such as councils, from discriminating against suppliers based in other parts of the UK. A direct award - or any explicit favouring of a local business - could be open to challenge

under both UKIMA and the [WTO's GPA \(Agreement on Government Procurement\)](#) of which the UK is a signatory.

## What the Good Food Nation Plan says about procurement

12. The Good Food Nation Act 2022, like the [Community Wealth Building Bill](#), does not change procurement law. It is “framework legislation” which makes a set of requirements relating to plans, consultation and reporting. These all have implications for local authorities, but they do not *compel* them to change how they procure goods and services.

13. The proposed Good Food Nation Plan summarises the procurement situation now but does not propose any new policies or targets in this area. It signposts another document, [Local Food for Everyone](#) (published January 2024) which highlights the importance of better access to procurement opportunities for local food producers. This discusses in some detail what the Scottish Government wants to achieve in the sense of “harnessing public sector procurement” and sets out how this can be achieved.

14. The Scottish Government wants to see:

- Greater use of qualitative, fresh, nutritious and seasonal food and drink across the public sector.
- Food suppliers in Scotland feel enabled and are ready and able to bid for catering contracts.

How this can be achieved:

- We plan to update Catering for Change, which will set out principles in relation to sustainable procurement of food and catering services in the public sector, to align public procurement behind sustainable, low carbon farming and food.
- Building on the links made between the national and local Good Food Nation Plans to support wider consideration of food policy when considering best practice in public procurement.
- Support schemes such as the Food for Life Scotland programme to help local authorities and the wider public sector increase local food on the table, which delivers a vital boost to local economies.

15. To encourage better access to public sector procurement for local food producers, the Strategy sets out the following:

- The Scottish Government’s ‘Better Eating, Better Learning’ guidance provides a framework for sustainable food and drink for educational settings.
- Local authorities, supported by Scotland Excel, remain committed to using fresh, seasonal and sustainable produce in school catering wherever

possible, as they have done for many years, recognising the wide-ranging benefits of doing so.

- The Scottish Government will use feedback gathered via this strategy consultation and engagement with local authorities and public sector procurement groups to inform an update of 'Catering for Change: buying food sustainably in the public sector', providing guidance for anyone involved in the procurement of food or catering services in the public sector.

## **Procurement - summary of written responses**

16. Some respondents to the Committee's call for views would like to see the proposed National Plan provide a stronger mandate for local authorities to prioritise Scottish produce in procurement.

- The Scottish Crofting Federation acknowledges the flexibility provided by the 2014 Procurement Act and notes that councils have some "margin of discretion to consider additional factors other than price". They believe "these policies do not seem to work, and flexibility is not enough".
- The Federation highlights the recent example of Mossgiel Organic Dairy Farm losing a contract to supply organic milk to East Ayrshire schools. This contract was instead won by international dairy company Müller.
- The Care Inspectorate makes a similar point with regards to procurement and children's services. It is their understanding that local authorities "undertake procurement and buy in bulk as this is more cost effective for their budget".
- Seafood Scotland would like to see "stronger mechanisms and incentives for local authorities to procure high-quality Scottish seafood - particularly from small- and medium-sized processors and suppliers - within school meals and other public sector catering".
- Highland Council would like to see "clearer, practical guidance from the Scottish Government on how to embed Good Food Nation principles into procurement without breaching existing regulations." Likewise, Aberdeenshire Council wants more guidance and resources for councils to support small and medium-sized local producers to access public contracts.

## **Local Good Food Plans and associated costs**

17. Part 10 of the Good Food Nation Act requires local authorities and health boards to produce their own Good Food Nation plans, which must "have regard to" the National Plan. This part of the Act is not yet in force, but it seems likely it will come into force late next year. Local authorities will then have 12 months to publish their plans. [Section 11](#) sets out the principles local authorities "must have

regard to” and [Section 12](#) sets out the requirement to consult on a draft of their plans.

18. A relevant authority’s good food nation plan must set out:

- the main outcomes in relation to food-related issues which the relevant authority wants to be achieved within the relevant authority’s areas of responsibility,
- indicators or other measures by which progress in achieving the outcomes may be assessed, and
- the policies which the relevant authority intends to pursue in order to secure the achievement of the outcomes.

19. In March 2025, [the Scottish Government published guidance](#) for “relevant authorities” on how to write Good Food Nation Plans. There is no specific mention of the word “procurement”.

20. The [Stage 1 committee report for the Good Food Nation Bill](#) discussed the additional costs local authorities are likely to face as a result of the new legislation. The Financial Memorandum accompanying the Bill set out an average administrative cost for staff resources, consultation and publication of the plans across all local authorities of £880,704 (year one); £221,536 (every other year subsequently); and £345,568 (every fifth year subsequently).

21. During Stage 1 scrutiny, Argyll and Bute Council told the Rural Affairs and Islands Committee that, “without adequate resources, the plan will ultimately become a piece of paper with ambitions on it”. As such, the Rural Affairs and Islands Committee made the following conclusions and recommendations:

- The Committee notes the financial memorandum only sets out the estimated costs for the relevant authorities to draft and consult on their good food nation plans, and to report every two years and review, and potentially revise, every five years.
- The Committee also notes, however, that the FM does not set out any costs relating to the implementation of the bill. Although this is a framework bill, and the detailed content of the plans is not set out in the legislation, there is a clear intention that these plans will support relevant authorities to progress their food-related policies and to make meaningful strides in achieving the good food nation ambitions.
- The Cabinet Secretary sought to reassure the Committee on this point, indicating that discussions are on-going with local authorities and health boards around these possible costs. The Committee notes there is no scope for parliamentary scrutiny of these costs. The Committee requests that a revised financial statement is provided to the Parliament in advance of Stage 2 setting out the Scottish Government’s expectations about what costs may fall to relevant authorities and how this will be resourced.

22. The [Scottish Government responded](#) with the following:



“The Scottish Government note the comments of the Committee in relation to the costs of the implementation of the Bill and would reiterate that the costs in the Financial Memorandum provide an estimate of the costs of preparing the plan, the costs of implementing the plan have not been provided as the plans do not yet exist.”

## **Local authority costs and capacity – responses to the call for views**

23. A number of responses to the Committee’s call for views highlighted the issue of costs to local authorities and current capacity within local government procurement teams. The Scottish Wholesale Association, for example, stated:

“If we are serious about using procurement to support local economies and improve food outcomes, we need more than just guidance - we need targeted interventions that reshape procurement practice at the local level, delivering both structural and practical change.”

And

“[we need] dedicated funding to build procurement capacity, allowing Local Authorities to invest in systems, staff, and partnerships including work with wholesale suppliers.”

East Renfrewshire Council states:

“The primary issue is the lack of resourcing associated with the Scottish Government directive, and the limited capacity of East Renfrewshire—already a constrained local authority—to develop and implement such a plan.”

Food Poverty Action Aberdeen writes:

“A crucial factor in the success of local Good Food Nation Plans is that any additional responsibility must be adequately and realistically funded. An overall review of how local government is funded in Scotland (and the UK) is long overdue, and without this, risks lessening the positive impact that the Good Food Nation Plan would otherwise have.”

South Lanarkshire Council states:

“There have been comments returned from several relevant teams regarding clarification around funding, this has been discussed in terms of increase food costs and resources to manage and meet all the requirements.”

Consumer rights organisation Which? focussed on food enforcement teams:

“An effective food enforcement system is fundamental to ensuring that the aims of the Good Food Nation Plan are delivered. It is therefore important that

the capacity and skills of environmental health teams and their role relative to Food Standards Scotland are considered as part of the Plan.”

## Community growing

24. Community growing is an area of interest to this committee, and it looked at the issue in some depth during its post-legislative scrutiny of [Part 9 of the Community Empowerment Act 2015](#). The focus of that legislation is on allotments, but it also requires local authorities to prepare food-growing strategies and review them every 5 years.

25. The Committee found “the difficulty that communities experience in accessing land for growing is clearly an enormous barrier”. It also heard about increased waiting lists for allotments in several local authority areas.

26. The proposed Good Food Nation Plan includes the following aspiration:

“We want the people of Scotland to be active participants in building and maintaining a Good Food Nation. Encouraging and empowering people to grow their own food and participate in community food initiatives can have a range of positive impacts on mental and physical wellbeing as well as building a sense of community.”

and

“We aim to make more land available for community growing in all its forms and enable more people to access allotments and growing sites. The NPF4 is clear that local development plans should create healthier places, including opportunities for food growing and allotments. Development proposals that will have positive effects on health will be supported: for example where they incorporate opportunities for community food growing or allotments.”

27. The GFN Plan has only one mention of local food-growing strategies. These strategies – as [set out in the 2015 Community Empowerment Act](#) - should include the identification of land that may be used as allotment sites and identify other areas of land that could be used by a community for the cultivation of food. There is also no mention of local food growing strategies in the guidance produced by the Scottish Government in March.

## Wider strategies

28. During this parliamentary session, the Committee has heard about the plethora of plans, strategies and reporting requirements that are placed on local authorities by national legislation. The duty to produce local Good Food Nation Plans arrives in a landscape that already includes food growing strategies, local place plans, procurement strategies, procurement reporting and, in all likelihood, community wealth building action plans (see [Community Wealth Building \(Scotland\) Bill as introduced](#)).

## The Scottish Food Commission and local authorities

29. The 2022 GFN Act provides for the establishment of a new public body, the Scottish Food Commission. The Commission's powers were activated in June 2025 following the appointment of the Chair (Dennis Overton).
30. The Commission will review the progress and effectiveness of the national and relevant authorities' Good Food Nation Plans. It will advise, inform, and assist Scottish Ministers and relevant authorities, including local authorities, in making future improvements to their plans.
31. The Commission will also have a role in ensuring "outcomes and activities set out in the Good Food Nation Plans are both ambitious and effective in promoting the positive transformation of our food system".

## Measuring progress

32. The Act requires indicators and measures to be in place to assess Scotland's progress towards achieving the 6 GFN Outcomes.
  - Outcome 1: Everyone in Scotland eats well with reliable access to safe, nutritious, affordable, sustainable, and age and culturally appropriate food.
  - Outcome 2: Scotland's food system is sustainable and contributes to a flourishing natural environment.
  - Outcome 3: Scotland's food system encourages a physically and mentally healthy population.
  - Outcome 4: Our food and drink sector is prosperous, diverse, innovative, and vital to national and local economic and social wellbeing.
  - Outcome 5: Scotland has a thriving food culture with a population who are interested in and educated about good and sustainable food.
  - Outcome 6: Scotland has a global reputation for high-quality food.
33. Public procurement is relevant to 4 of these 6 outcomes, but the proposed GFN Plan states there are "issues around data availability". As such, "further consideration will be given as to whether there are public procurement targets that could be developed for future iterations of the national Good Food Nation Plan".
34. Nourish Scotland believes the Plan should include targets for procurement priorities that support inclusion of local, organic and high welfare products in public catering.
35. Scotland Excel believes that the Plan would benefit from more specific, measurable goals, "such as targets for reducing food insecurity, increasing local sourcing, or improving diet-related health indicators".
36. A number of individuals responding to the call the views believe that targets relating to percentage of procurement spend going to local businesses should be

included in the Plan. Quality Meat Scotland would like the Plan to require local authorities to report annually on spend with Scottish-assured producers, such as those accredited through the QMS assurance schemes.

37. On the issue of community growing, the Glasgow Allotments Forum expresses surprise “at the lack of clear, meaningful actions and targets proposed for allotments and community growing spaces”.

38. The Scottish Communities Climate Action Network goes further, saying they are “disappointed that there are no new targets and that this exercise feels like it’s not action orientated”. Likewise, the Highland Good Food Partnership states that the Plan “does not propose any new actions and targets, neither does it commit to new indicators or areas of policy development. As such, while it is a comprehensive audit of existing policies, it fails to drive action towards a food system transformation we badly need.”

**Greig Liddell, SPICe Research  
August 2025**

Note: Committee briefing papers are provided by SPICe for the use of Scottish Parliament committees and clerking staff. They provide focused information or respond to specific questions or areas of interest to committees and are not intended to offer comprehensive coverage of a subject area.

The Scottish Parliament, Edinburgh, EH99 1SP [www.parliament.scot](http://www.parliament.scot)