



# Sustainability Plan





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## **In 2021, Food Standards Scotland (FSS) published our Strategy to 2026 and articulated our vision of a safe, healthy and sustainable food environment that benefits and protects the health and well-being of everyone in Scotland.**

Our consumption of sugar, salt and fat are too high and fibre, fruit and veg are too low. Moving from our current diet towards the Eatwell guide would be a more sustainable way of eating. **The Carbon Trust** investigated the sustainability of the Eatwell Guide and found that it has a 32% lower environmental footprint than the current UK diet. Therefore, we must consider not only the sustainability of the food we eat but the wider system consequences of failing to tackle poor diet. Increased health problems resulting from diet make our population less productive and increase the burden on essential services. This in itself is unsustainable and the trajectory of obesity and overweight must be reversed.

It is worth noting that there are large disparities in health, with those from more deprived areas having the poorest diet and health outcomes. Our work aims to reduce health inequalities incorporating sustainability considerations, however we are cognisant that actions to address both may not always be complementary of each other.

We regulate according to a “Farm to Fork” model and should think of sustainability in the same way. Shortening food supply chains, choosing food in season where possible, encouraging the consumption of more locally grown fruit and vegetables, eliminating excess packaging and waste within the system, and ensuring that we eat a healthy and balanced diet are all likely to contribute to improved environmental outcomes. We want to support and encourage these outcomes while sustaining Scotland’s businesses and considering what fiscal levers could help influence consumer behaviour. We must consider what new consumer trends tell us about the future of feed and food, and what balance is to be struck between entirely voluntary initiatives and regulation when it comes to diet.

We know that tackling the climate emergency and bringing about changes to our food and animal feed systems will require action with cooperation across international boundaries to share solutions and bring about change.





FSS is committed to ensuring sustainability is embedded into our decision making processes and actions to continue to play a role in tackling the enormous environmental challenges facing Scotland, and the world.

The climate emergency is real, and it is affecting all of us. Science tells us there are tangible actions which must be taken now to prevent irreversible consequences.

## Food culture in Scotland must become part of the solution.

Our ambition is to influence the regulatory architecture that makes safe, healthy and sustainable food outcomes the norm here in Scotland, across the UK, and further afield.

We are independent from Government and ideally placed to act as the conduit; collaborating to drive improvements. Our evidence base and scientific expertise influence standards set at an international level as well as being genuinely open to innovation whether it comes from the public, business, academia, or indeed regulators around the globe.

As a regulator, FSS is involved in a number of areas which aim to improve the sustainability of our food and feed, including working with Scottish Government colleagues and the Food Standards Agency on developments in insect farming and the use of insect protein in animal feed. We also work with Zero Waste Scotland on initiatives to reduce food waste. And we advise consumers on a diet which is better for health and for the planet.

We are also working with the Food Standards Agency and food packaging manufacturers to increase the amount of plastic that can be recycled for food grade use rather than end up in landfill of the wider environment.

## Case Study: Our Offices

As an organisation, we make use of our own policies and technology to improve our greenhouse gas (GHG) emissions profile. For example, our adoption of hybrid working beyond the pandemic has significantly reduced the number of journeys needed to engage with stakeholders. We have also worked to reduce GHG emissions from our buildings and invested in fully electric vehicles: our fleet of pool cars are now ultra-low emission vehicles; our energy provider for head office was selected based on their dedication to and use of renewable sources, and the waste management contractors for head office are contracted due to their environmental due diligence where no waste is sent direct to landfill, and recycling is prioritised. These actions are driving our contribution, but we know we need to work harder and faster.

This agenda is vitally important to us. FSS does not have powers to change regulation – we advise Ministers and they can change regulations if they agree with our advice. We will build on this plan to ensure that we factor sustainability into our advice to Ministers to inform changes to the law and promote voluntary action such as improving the out of home food environment.

**FSS will be active in Scotland achieving its net zero goals. This first FSS Sustainability Plan is a big step forward in articulating our role and areas for future focus.**







The Scottish Government (SG) has an ambitious objective to reach net zero emissions by 2045, and organisations across the country are pushing to reduce their carbon footprint. In recent years, there have been a number of improvements implemented that have improved the sustainability of FSS's headquarters at Pilgrim House in Aberdeen.

Agreements are in place between the landlord for Pilgrim House and FSS with a view to using the energy tariff with the best performance in relation to atmospheric emissions. A cost benefit analysis is carried out by the landlord when new energy contracts are renewed and awarded to the supplier who performs well in both emissions per kWh and cost. The landlord is ISO 14001 (environmental management) accredited and this provides confidence that any decisions taken consider environmental performance as a priority.

When changing the waste contractor it was agreed companies considered should provide reliable data and proactively seek out methods to include recycling and reduce waste to landfill wherever possible. Although this did not directly reduce the amount of waste produced, it did affect how the waste was managed, as emissions through landfill are significantly higher than those for recycling or when energy from waste through combustion can be utilised.



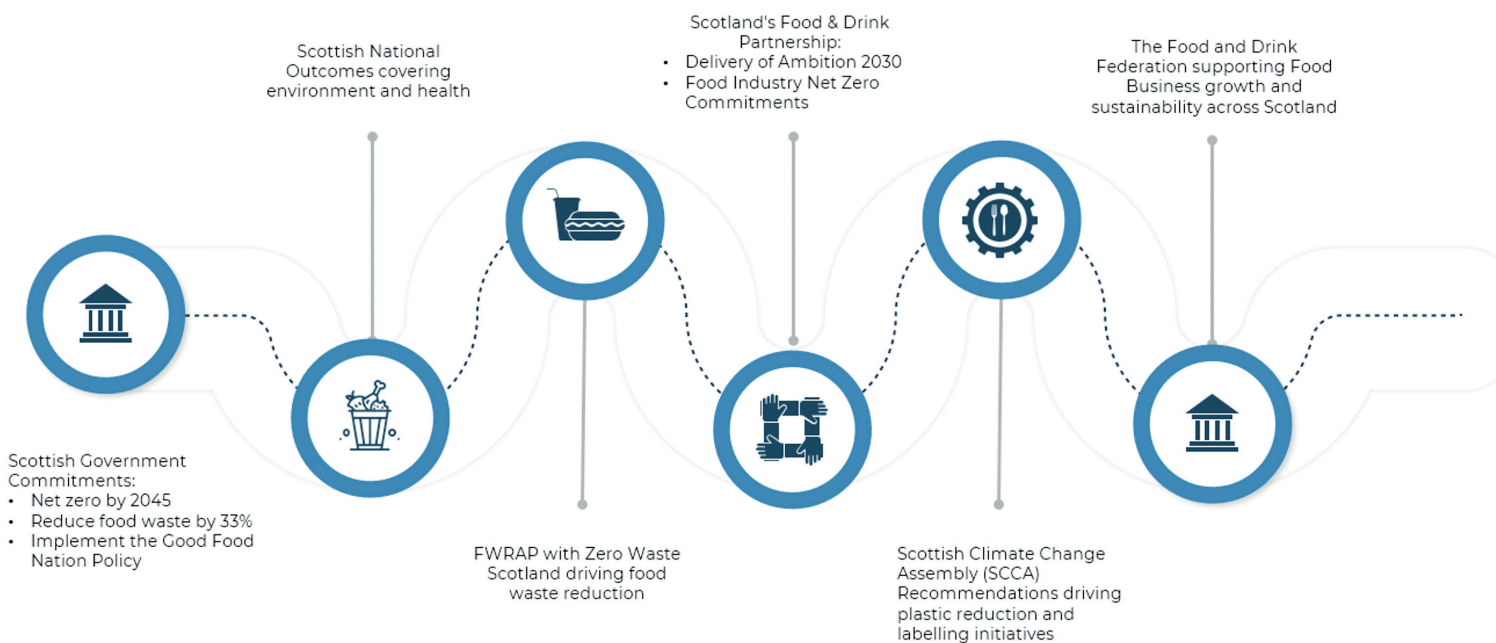
# Why an FSS sustainability plan?

The food environment is at the centre of many of today's global sustainability challenges and opportunities, and the concept of sustainability has become increasingly important to the people of Scotland.

It is an area where consumers and stakeholders have indicated that FSS has a role to play.

As the independent, public sector food body for Scotland, FSS is well placed to positively contribute towards a regulatory environment where businesses and consumers can contribute and support Scotland meeting the Scottish Government's target of net zero by 2045.

The United Nations' Sustainable Development Goals (UN SDGs) were adopted by all United Nations Member States in 2015 as a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030. FSS already addresses many of the 17 SDGs through its current remit. But there is an opportunity for FSS to include more focus on the environmental SDGs.





# Where can FSS influence environmental sustainability?

FSS's remit is broad and varied, as are our stakeholders including the Scottish and UK Governments and regulated businesses. Farms, food businesses, Local Authorities and consumers each have different challenges and opportunities to meet net zero targets and improve environmental sustainability.

All actions taken across FSS, the food and feed industry, and consumers will culminate to have an impact. The below table demonstrates FSS's key, but not unique, role in improving sustainability in Scotland's food sector.

Food landscape	FSS' role includes	Where FSS influences sustainability today
<b>Farms</b> (including fish and shellfish)	Regulatory – operation of official control checks under EU law at primary production (inspections and sampling) for feed and food law  Application of controls in areas harvested for live bivalve molluscs including classification of areas and ongoing monitoring for marine biotoxins and phytoplankton	Food and feed safety and standards  Regulatory  Policy
<b>Slaughter</b>	Regulatory – animals protected prior, during and after slaughter, the provision of licenses and enforcement of law through verification, audit and inspection.	Permanent FSS Official presence in abattoirs to ensure all legal standards in relation to the production of safe meat are met, including animal welfare
<b>Food and Feed businesses</b> (including retail, manufacturing and the out of home sector, along with imports and exports)	Regulatory – provide framework for delivery of food law intervention conducted by Local Authorities  Direct responsibility for the delivery of feed law controls across farms and feed manufacturers e.g. feed mills, production of feed additives, pet food  Lead role in imported food and feed controls  Advisory – (including science-based research), support to LA and production of guidance and tools to assist in food businesses' compliance  Advisory – facilitating role trade and export of food and feed	Food and feed law includes pet food
<b>Consumers</b>	Advisory (including consumer research)  Influence consumers with the provision of advice on food safety and healthy diets  Communications on best practice	On healthy sustainable diets  Understanding consumer behaviours  Food waste

# What does our Plan contain?

In this plan we've identified specific areas and actions where we believe FSS can make a difference to improve environmental sustainability through our policies and business practices.

Where appropriate, we will also contribute to Scottish Government priorities and influence stakeholders for a sustainable food and drink environment in Scotland, and our collective commitments regarding climate change adaptation.

The areas identified are where we can initially focus our attention in a way that will have a positive, measurable and lasting impact on sustainability.

**An overall approach focused on environmental sustainability as a key part of all future FSS strategic plans**

**Environmental sustainability as part of every FSS policy decision**

**A sustainable organisation reducing FSS's direct footprint**

**FSS has identified a number of environmental programmes that can positively impact Scotland's food environment:**

- Integrate environmental sustainability opportunities into existing consumer campaigns
- Support Zero Waste Scotland in reducing Scotland's food waste
- Support potential Scottish Government policies to integrate sustainability into food labelling
- Explore FSS's role in advising on food packaging materials to drive sustainability
- Incorporate environmental considerations in our guidance to businesses on how to support healthy sustainable diets



# Our Sustainability Plan

FSS's guiding principles support the development and implementation of this Sustainability Plan.

**Our values and guiding principles:**

**Consumer-focused**

**Evidence-based**

**Fair and proportionate**

**Independent**

**Inclusive and open**



# Commitment 1

**An overall approach focused on environmental sustainability as a key part of all future FSS strategic plans.**

Climate change presents future challenges concerning the security, nutritional quality and safety of our food supply chain. While the full impacts are not yet fully understood, FSS's Strategy 2021 - 2026 sets a road map that will enable us to identify the risks to consumers and businesses, and support Scotland in building a safe, healthy and sustainable food environment for the future.

**Action:**

- We will integrate environmental sustainability into our strategic plans and programmes.

# #1

# Commitment 2



## **Environmental sustainability as part of every FSS policy decision.**

FSS has an opportunity to influence regulatory process and affect internal operational decision making to ensure that the environmental impact of policy decisions is considered. This will help to integrate environmental sustainability into the heart of our decision making processes.

### **Actions:**

- We will include specific environmental sustainability considerations in policy decision making frameworks and templates.
- We will investigate sustainability issues relevant to Scotland and integrate into the decision-making process; including complexities with environmental, social and economic factors. Agree the environmental red lines and the corporate opportunities of effective decision making.

# #2



# Commitment 3

## **A sustainable organisation reducing FSS's direct footprint.**

The Scottish Government's 2045 Net Zero target from the Scotland Climate Change Act (2019) requires public bodies, such as FSS, to develop their own net zero plans to meet the target.

### **Actions:**

- We will set a net zero target aligned to wider business objectives.
- We will build on our Carbon Management Plan 2017 baseline for energy, waste, water and travel and target to reduce energy use by 2.5% per year at Pilgrim House.
- We will create a pathway for FSS to reduce direct emissions and achieve net zero.
- We will develop a simple wider plan to integrate sustainability considerations into office consumables.

# #3

# Commitment 4



**Simple, effective governance to deliver and report on the progress of our programme.**

**Actions:**

- We will manage our environmental sustainability commitments through a programme approach ensuring that the appropriate FSS teams drive/contribute.

# #4

## Case Study: FSS Pool Cars







FSS used diesel pool cars from 2015 through to 2018, when the small fleet was mostly replaced with electric Nissan Leafs.

The decision to purchase electric pool cars followed assessments of the hydrocarbon emissions experienced through the diesel fleet, along with an agreement from the Pilgrim House landlord that an electric car charging point would be installed on site.

2019 saw the inclusion of a petrol-hybrid to ensure the fleet based in Pilgrim House consists of only ultra-low emissions vehicles (ULEV). In 2022, two more petrol-hybrid ULEVs were purchased for the Scottish Food Crime and Incidents Unit (SFCIU), further reducing use of the higher emission fleet or hire cars.

The tailpipe emissions per mile, when comparing against the diesel cars, have seen a -30% drop when using the hybrids and a 100% reduction when using the Nissans.



# Commitment 5

**We will deliver a number of specific projects which support Scotland's environmental priorities.**

FSS's policy and operational work positions the organisation as a natural leader in some important elements of the Scottish Government and wider UK sustainability ambitions. In addition, FSS has a key role to play in support of others.

The following discreet projects, while not exhaustive, offer FSS an opportunity to make a significant impact on environmental sustainability.

# #5

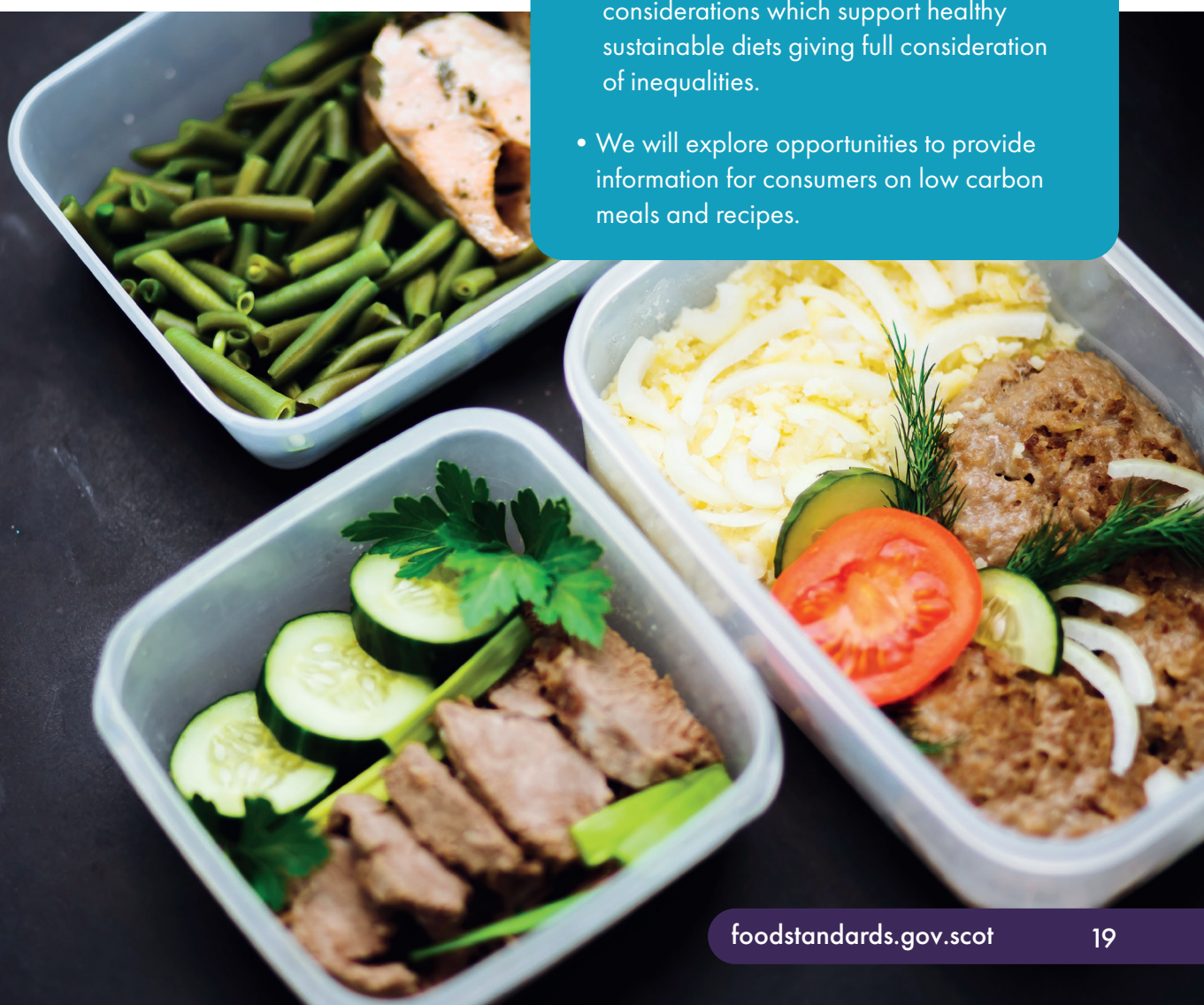
# Environmental project 1

## Integrate environmental opportunities into existing consumer campaigns.

FSS's **most recent consumer tracker** survey revealed that the impact of food production and packaging on the environment continues to be in the 'Top 10 areas of concern' for people in Scotland. Through FSS's integrated marketing campaigns on providing healthier diet advice to consumers, there is an opportunity for us to link the environmental impact of food whilst supporting healthy eating.

### Actions:

- We will ensure sustainability of a healthy balanced diet is taken into account in all aspects of the work programme.
- We will develop FSS's healthy sustainable diet evidence base (e.g. work on GHG emissions associated with existing Scottish diet) and share results with the Scottish Government, other bodies, consumers and stakeholders.
- We will continue to investigate the contribution of food produced in Scotland to the Scottish diet.
- We will influence Scottish Government policy developments to include considerations which support healthy sustainable diets giving full consideration of inequalities.
- We will explore opportunities to provide information for consumers on low carbon meals and recipes.





# Case Study: Eat Well Your Way, Sustainably





FSS developed the Eat Well Your Way (EWYW) tool to deliver practical, pragmatic advice to support consumers in making healthier, and more sustainable, food and drink choices at home and out and about. The resource is online, which avoids the need for paper-based leaflets and posters and delivers tips to consumers around eating more sustainably.

For example, the resource prioritises advice on non-animal proteins over animal protein, promotes tap water as a main drink for adults and older children and a reduction in purchases of food to help prevent food and plastic waste.

A key element of the resource supports meal planning, to save consumers money and reduce food waste. There is also advice on storing and reusing leftover food. There is more that EWYW can do to support people in making healthier, more sustainable choices, and there are plans in place to expand the resource in the future.





## Environmental project 2

### Support Zero Waste Scotland on reducing Scotland's food waste.

FSS has an important, but not exclusive, role in delivering Scotland's Food Waste Reduction Action Plan.

Household food waste in Scotland accounts for 2.24m tonnes of CO2 equivalent – around 3% of Scotland's carbon footprint. According to FSS data, three-quarters of consumers say they always actively try to reduce food waste, but more needs to be done.

#### Actions:

- We will confirm key areas where FSS is leading and where FSS might do more based on latest research since the Food Waste Action Plan was published.
- We will then agree specific priorities and build an outline programme to deliver the following:
  - FSS supports businesses, charities and food banks through the provision of advice on safe food redistribution.
  - Support ZWS in the promotion of food re-distribution schemes in the retail and catering sectors through the provision of tailored food safety advice and communications activities.
- We will influence action by government and industry to drive initiatives to reduce the use of best before dates on foods which do not require date labelling for safety reasons, to reduce scope for food waste.
- We will increase consumer messaging to instigate behavioural change e.g. ways consumers can use all the food they buy.





## Environmental project 3

### Support Scottish Government on integrating sustainability into food labelling.

Consumers should be confident and informed with their food choices through clear labelling and able to buy according to their preferences and/or requirements such as sustainability.

FSS's consumer data demonstrate that the sustainable production and packaging of food is an important issue for consumers, but less than half (44%) feel they have clear information about this.

#### Action:

- We will champion the need for clearer and consistent sustainability labelling to inform consumers at the point of choice.





## Environmental project 4

### Explore FSS's role in advising on food packaging materials.

FSS data shows that 64% of consumers are concerned about the impact of food production and packaging on the environment.

Food and packaging is a key part of the Scottish Government's targets to reduce total waste by 15% by 2025 against 2011 levels, and also to cut food waste by 33% against 2013 levels.

There is a need for clear, evidence-based advice to government and FSS has an opportunity to support innovation in an evidence-led and nimble way.

#### Actions:

- We will work with Zero Waste Scotland and WRAP to support existing programmes and to agree where FSS has a role to play.
- We will support them to develop a 'one Scotland' approach.
- We will consider how we can provide better guidance for businesses seeking authorisation for new sustainable food packaging materials, including the evidence needed to support risk assessment.



## Moving forward

While the first FSS Sustainability Plan will support us to better articulate our priorities and measure performance against them, we must acknowledge there are internal and external challenges and risks linked to this plan such as:

Risk of not meeting our own aspirations particularly where we don't have direct control in our ability to improve performance e.g. in regard to organisational GHG emissions where our property arrangements are managed by others;

Lack of usable data;

Consumer confusion around labelling and dietary guidance;

FSS's influence to advise on regulation with sustainability in mind within the food industry;

Our evidence base is not guaranteed to support a sustainable recommendation/course of action, and on occasion may work against it;

Duplication of work stream which could be done in collaboration with other bodies; and,

Resourcing.

FSS's Sustainability Plan is considered by the organisation as a living document – subject to a regular cycle of review and refresh.

This is important to ensure the most relevant data is included and the priorities remain timely and appropriate.



