Response ID ANON-EMGG-NKG4-M

Submitted to Climate change duties - draft statutory guidance for public bodies: consultation
Submitted on 2025-05-23 16:27:21

Climate change and equalities

1 With respect to the protected characteristics, could the content of the Statutory Guidance be changed or added to, to strengthen any positive impacts or lessen any negative impacts as it is implemented by public bodies?

Yes

If so, how? Please give us your views.:

The Statutory Guidance should detail how the human rights and equalities duty under The Climate Change (Scotland) Act 2009 requires public bodies to do more to correct climate injustices.

Specifically, guidance to end the huge climate harms of agri-food whilst ensuring universal sustainable, culturally appropriate food security should explicit. The proposed expansion of Scope 3 accounting is insufficient to do this.

People systematically marginalized via protected characteristics, and non-human animals too, are disproportionately suffering climate change harms (IPCC 2023) and food insecurity. Scotland as a Global North country has caused carbon dioxide emissions far exceeding the total all-time global fair share for Scotland's people (Hickel 2020).

Thus, Scotland has a proportionately great responsibility to reduce, and sequester, GHG emissions.

Industrial scale farming of animals is disproportionately harmful, including GHG emissions, for the nutrition produced (Ritchie, Rosado & Roser 2022). By transitioning to plant-based food production, Scotland will more rapidly end food insecurity, significantly decrease GHG emissions, and contribute up to one third of the UK's carbon dioxide sequestration through faster return of tree cover (Harwatt and Hayek 2019).

Furthermore, under Article 28 of the Universal Declaration of Human Rights (UDHR, 1948), everyone is entitled to a social order in which their human rights are respected and provided for; this includes protected philosophical belief of veganism to avoid any use of non-human animals for any human purpose (Equality Act 2010, Postle 2020).

References

Climate Change (Scotland) Act 2009, https://www.legislation.gov.uk/asp/2009/12/contents (accessed 2025-05-21)

Harwatt & Hayek 2019, Eating away at climate change with negative emissions: Repurposing UK agricultural land to meet climate goals (2019), Harwatt, H & Hayek, M
https://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93%E2%80%93Harwatt-Hayek.pdf (accessed 2025-05-21)

Hickel 2020, Quantifying national responsibility for climate breakdown: an equality-based attribution approach for carbon dioxide emissions in excess of the planetary boundary
IPCC 2023, : Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report (AR6) of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, doi: 10.59327/IPCC/AR6-9789291691647 (accessed 2025-05-01)

Postle 2020, Preliminary Hearing Judgement 3331129/2018, Casamitjana Costa V The League Against Cruel Sports, Employment Judge R. Postle
https://assets.publishing.service.gov.uk/media/5e3419ece5274a08dc828fdd/Mr_J_Casamitjana_Costa_v_The_League_Against_Cruel_Sports_-_3331129-18_-_Open_P (accessed 2025-05-01)

2 With respect to inequality caused by socio-economic disadvantage, could the content of the Statutory Guidance be changed or added to, to strengthen any positive impacts or lessen any negative impacts as it is implemented by public bodies?

Yes

If so, how? Please give us your views.:

Sustainable, culturally appropriate food security is a vital part of ending inequality due to socio-economic disadvantage.

As explained in our answers to Qs 5, 9 and 11, Scotland's current level of animal-based food consumption has negative impacts on public health, both directly and through its negative impact on the environment.

These impacts affect those suffering from socio-economic disadvantage disproportionately.

In the words of Food Standards Scotland: "It is well evidenced that those living in the most deprived areas tend to have the worst diets and therefore may have less scope to make changes to their diets for health or sustainability reasons due to other priorities, concerns around affordability and less access to

a wider range of foods."

A government-led Scotland-wide transition towards more plant-based diets will align the Scottish diet, and in particular that of people suffering economic disadvantage, more closely with national nutritional guidance, the Eatwell Guide.

That can be led by public authorities, including through public procurement which is a major policy lever by which climate change and other environmental harms can be reduced, and the plant-based sustainable, healthy food system transition can be supported.

Greater inclusion of measures to support dietary change within the guidance will not only help public bodies to meet their climate change obligations, but will encourage and facilitate policy changes which bring multiple co-benefits (see Qs 5, 9 and 11) and address inequalities.

References

Food Standards Scotland 2021, Modelling the impact of reductions in meat and dairy consumption on nutrient risks and disease risk: summary briefing https://www.foodstandards.gov.scot/downloads/Summary_briefing_-_Modelling_the_impact_of_reductions_in_meat_and_dairy_.pdf [accessed 2025-05-23

Taking climate into account in decision making

3 Does the guidance make it clear how public bodies can fulfil the requirement to 'best calculate' the climate impact of their actions?

Partially

Please provide comments below.:

As addressed in our answers e.g. to Qs 1, 2, 5, 6 and 15, an optimal (or even adequate) evaluation of a public body's responsibilities and impact must include those associated with the climate change effects related to food.

This needs to be both in terms of Scope 3 emissions resulting from procurement, and also in respect to other mechanisms by which public bodies may influence and affect production and consumption of animal-based foods.

There is too little information in the guidance about the specific, accessible climate benefits of adopting and supporting a plant-based transition across the full supply-value chain.

Industrial scale farming of animals tends to produce less food value from a given area of high-quality crop land (where non-grazed feed is grown) and emit more greenhouse gas (GHG) than the equivalent mass, calorie-energy content or protein content in plant-based food.

Expert opinion and evidence in the peer-reviewed literature is clear that, in the words of the Intergovernmental Panel on Climate Change (IPCC), "Diets high in plant protein and low in meat and dairy are associated with lower GHG emissions" (IPCC 2022).

Similarly, the lower land use required for the production of plant foods for direct human consumption (in comparison to land use for animal-based foods) will free up land for habitat restoration, reforestation and other activities ('rewilding') that both increase sequestration of carbon and improve adaptation capacity (IPCC 2022; Climate Change Committee 2025; Poore & Nemecek 2018; Scarborough et al. 2023).

The evidence also shows that what people eat is more significant than how far it has travelled, making locally produced plant-based food a strong 'win-win' for public bodies.

Therefore, a clear understanding of the relative climate impacts of plant-based and animal-based agri-food systems is required to ensure that procurement activities are undertaken in line with relevant legislation, the Sustainable Procurement Duty and the Guidance's requirement to 'best calculate' climate impacts.

This Statutory Guidance should explicitly signpost public bodies to plant-based food procurement - and other measures including relation to Scope 3 emissions, as outlined in answers below - which can foster lower industrial-scale production and consumption of animal-based foods.

A topic supplement on sustainable procurement must then provide information about the impacts of animal- and plant-based foods in sufficient depth and detail to enable public bodies to fulfil the requirement to best calculate their impact in that area.

References

Climate Change Committee 2025, Scotland's Carbon Budget
https://www.theccc.org.uk/wp-content/uploads/2025/05/Scotlands-Carbon-Budgets-1.pdf (accessed 2025-05-23)

IPCC AR6 WG3 2022, Chapter 4: Mitigation and development pathways in the near- to mid-term in Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Shukla PR et al (eds.)]. CUP UK and USA. doi: 10.1017/9781009157926 (accessed 2025-05-02) https://www.ipcc.ch/report/ar6/wg3/

Poore & Nemecek 2018, Reducing food's environmental impacts through producers and consumers. Poore J & Nemecek T (2018). Science, 360(6392), 987-992. https://www.science.org/doi/10.1126/science.aaq0216 (accessed 2025-05-02)

Ritchie, Rosado & Roser 2022, "Environmental Impacts of Food Production" Ritchie H, Rosado R, and Roser M (2022) for Our World in Data

https://ourworldindata.org/environmental-impacts-of-food (accessed 2025-05-01)

Scarborough et al. 2023, Vegans, Vegetarians, fish-eaters, and meat-eaters in the UK show discrepant environmental impacts. Scarborough P, Clark M, Cobiac L, Papier K, Knuppel A, Lynch J, Harrington R, Key T and Springmann M. Nature Food 2023; 3: 565–574, https://doi.org/10.1038/s43016-023-00795-w (accessed 2025-05-02)

4 Does the guidance make it clear how public bodies should take future climate scenarios into account when making plans and investment decisions?

Don't know

Please provide comments below.:

No comment

The first duty: reducing emissions (climate change mitigation)

5 Do you have any comments about the guidance provided in this chapter on complying with the first duty?

Please give us your thoughts. For example, are there any gaps or are there ways that you think it could be improved.:

There is a significant gap in the guidance arising from its neglect of the role of dietary change in mitigating climate change, and consequently the ways in which public bodies can take action in this area.

There is a clear expert scientific consensus now that transitioning away from animal-based foods towards plant-based foods brings a double dividend, both reducing direct emissions and making land available for sequestration (Climate Change Committee 2025; IPCC 2022; Poore & Nemecek 2018; Dimbleby 2021).

Direct methane emissions from cows and sheep and methane and nitrous oxide emissions from manure all contribute directly to climate change. The biggest single source of Scotland's territorial methane emissions come from the agri-food sector (over 45% of 10 MtCO2e territorial emissions in 2020 [Scottish Greenhouse Gas Statistics 2020],) and this figure does not account for consumption emissions arising from food imports.

Meanwhile, 85% of the land used to feed the UK population is devoted to animal agriculture, even though it produces just a third of our calories (Dimbleby 2021). In Scotland, currently, around half (49%) of arable land is used to feed farmed animals rather than to produce food directly. (Harwatt & Hayek 2019). Production of plant-based food for direct human consumption uses significantly less land than grazing or growing animal feed for the same nutritional content. Releasing land from food production in this way allows it to be used for reforestation (or other forms of habitat restoration or recreation ['rewilding']), helping to sequestrate carbon. In 2019, researchers found that restoring all current grazing land in the UK to forest would sequester up to nine years' worth of our CO2 emissions, directly supporting healthy food production and producing fertility-building composts too (Harwatt & Hayak, 2019).

Reducing levels of consumption animal-based foods produced on industrial scales is thus widely endorsed by expert bodies as a climate mitigation action. The 2021 Independent Food Strategy for England stated, "we simply cannot reduce methane emissions to a safe level, nor free up the land we need for sequestering carbon, without reducing the amount of meat we eat" (Dimbleby, 2021).

The Climate Change Committee has consistently recommended dietary change. The agriculture and land use pathway proposed in its Seventh Carbon Budget (2025) requires land use change, primarily for reforestation, to achieve the UK's Net Zero goals. Within the pathway, 68% of the land the committee proposes should be changed by 2040 will be released by reducing the industrial scale farming of animals. The committee states: "Early action is vital to release land from agriculture and scale up tree planting to deliver the sequestration potential of new woodlands before 2050." To achieve this, the pathway proposes a 38% reduction in industrial scale farming of animals by 2050, driven primarily by a 35% reduction in meat consumption by 2050, and a 20% reduction in dairy consumption by 2040.

Despite this abundant evidence and expert opinion, the potential for public bodies to mitigate emissions through policies addressing diet and food is referenced only once in the guidance, and with no explicit reference to plant-based foods. In particular, for large organisations supplying food – such as hospitals and prisons - sourcing and providing plant-based foods may make a significant, and relatively easy to implement, contribution to mitigation.

The mitigation guidance also rightly refers to the importance of considering co-benefits in evaluating mitigation approaches. Transition towards more plant-based diets also brings co-benefits.

The health case for higher consumption of nutritious plant-based foods – especially fruit, vegetables, legumes, pulses and nuts – and lower consumption of meat and dairy is widely and deeply supported across experts and expert bodies, including in the UK Government- commissioned independent 2021 Food Strategy Dimbleby Report and by the EAT-Lancet Commission, and is embedded in current UK nutrition guidance, the Eatwell Guide (NHS).

Plant-based diets are associated with many health benefits due to increased consumption of fruit, vegetables and fibre, and lower intake of saturated fat compared to a traditional UK/Scottish diet. Outcome 3 of Scotland's Good Food Nation Plan is that Scotland's food system encourages a physically and mentally healthy population, leading to a reduction in diet-related conditions. As Food Standards Scotland (FFS) has noted, however, "the majority of the population in Scotland do not have a diet similar to the Eatwell Guide" (FSS 2021). FSS concluded that reducing meat intake in line with Eatwell guidance will allow small reduction in cardiovascular diseases (CVDs) as well as c. 10,000 fewer cases of type 2 diabetes in Scotland within a ten-year period. Other evidence shows fully plant-based and vegan suitable diets would achieve much higher diabetes risk reduction: type 2 diabetes in vegans is c. 47% lower than in meat-eaters and the risk of all cancers and of CVDs is also lower (Henderson & Sampson, 2024).

The corresponding long-term public health benefits yield substantial savings on health, social care and illness-related benefits. Research indicates that a 20% reduction in average meat consumption could yield £1.2bn of savings to the NHS per year (CAWF, 2024), and that for every million people adopting a healthy vegan diet, NHS England could save £120m per year (Henderson and Sampson, 2024).

References

Climate Change Committee 2025, Scotland's Carbon Budget
https://www.theccc.org.uk/wp-content/uploads/2025/05/Scotlands-Carbon-Budgets-1.pdf (accessed 2025-05-23)

Conservative Animal Welfare Foundation 2024, The Two billion NHS Windfall: Why Meat Reduction Matters
https://www.conservativeanimalwelfarefoundation.org/wp-content/uploads/2024/01/2-Billion-NHS-Windfall-CAWF.pdf

Food Standards Scotland 2021.Modelling the impact of reductions in meat and dairy consumption on nutrient risks and disease risk: summary briefing
https://www.foodstandards.gov.scot/downloads/Summary_briefing_-_Modelling_the_impact_of_reductions_in_meat_and_dairy_.pdf (accessed 2025-05-23)

Henderson & Sampson 2024 (preprint) medRxiv 2023.12.26.23300536; doi: The impact of higher uptake of plant-based diets in England: model-based estimates of health care resource use and health-related quality of life https://www.medrxiv.org/content/10.1101/2023.12.26.23300536v1 (accessed 2025-05-23)

IPCC AR6 WG3 2022, Chapter 4: Mitigation and development pathways in the near- to mid-term in Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Shukla PR et al (eds.)]. CUP UK and USA. doi: 10.1017/9781009157926 https://www.ipcc.ch/report/ar6/wg3/ (accessed 2025-05-02)

Progress in reducing emissions in Scotland, 2021 Report to Parliament, Climate Change Committee
https://www.theccc.org.uk/wp-content/uploads/2021/12/Progress-reducing-emissions-in-Scotland-2021-Report-to-Parliament-1.pdf (accessed 2025-05-02)

Scotland's Carbon Footprint 1998-2021 (2025)
https://www.gov.scot/publications/scotlands-carbon-footprint-1998-2021/ (accessed 2025-05-02)

Scottish Greenhouse Gas Statistics 2020, Chief Statistician 2022,
https://www.gov.scot/publications/scottish-greenhouse-gas-statistics-2020/ (accessed 2025-05-23)

Scottish Greenhouse Gas Statistics 2022, Chief Statistician 2024,
https://www.gov.scot/publications/scottish-greenhouse-gas-statistics-2022/pages/section-b--results/ (accessed 2025-05-02)

6 Do you think the Carbon Management Plan template is suitable for its intended purpose as outlined above and in Annex A?

No

Please give us your thoughts.:

Due consideration needs to be given to the greenhouse gases beyond carbon dioxide, particularly methane, and we therefore propose this document be renamed, 'Emissions Management Plan'.
The examples provided under emissions scopes and targets in the document also do not include any reference to land use or procurement of foods. This is a serious omission, especially for smaller bodies which need clear guidance and may not consider this area. Figures from one of the largest comparable organisations, NHS England, suggest that 'indirect' greenhouse gas emissions may make up 75% of the total emissions of a public body (NHS 2022). Examples must include land use, food-related and Scope 3 emissions.

References

NHS 2022, Delivering a 'Net Zero' National Health Service, 2022, NHS England
https://www.england.nhs.uk/greenernhs/wp-content/uploads/sites/51/2022/07/B1728-delivering-a-net-zero-nhs-july-2022.pdf (accessed 2025-05-23)

7 Do you think the Climate Change Plan template for local authorities is suitable for its intended purpose as outlined in the drop down section below and in Annex B?

No

Please provide any additional comments below.:

Due consideration needs to be given to the greenhouse gases beyond carbon dioxide, particularly methane, and we therefore propose this document be renamed, 'Emissions Management Plan'.
The examples provided under emissions scopes and targets in the document also do not include any reference to land use or procurement of foods. This is a serious omission, especially for smaller bodies which need clear guidance and may not consider this area. Figures from one of the largest comparable organisations, NHS England, suggest that 'indirect' greenhouse gas emissions may make up 75% of the total emissions of a public body (NHS 2022). Examples must include land use, food-related and Scope 3 emissions.

References

NHS 2022, Delivering a 'Net Zero' National Health Service, 2022, NHS England

https://www.england.nhs.uk/greenernhs/wp-content/uploads/sites/51/2022/07/B1728-delivering-a-net-zero-nhs-july-2022.pdf (accessed 2025-05-23)

The second duty: adaptation

8 The guidance lays out an approach whereby public bodies should: review the Scottish National Adaptation Plan (SNAP); identify the objectives relevant to them; contribute towards those objectives; and, where relevant, report annually on progress in their public bodies climate change duties report.

Somewhat agree

Please provide any additional comments below.:

The Scottish Government has recognised that "we must make large scale and rapid changes in the way we use and manage our land to help reach our statutory net-zero targets." (Cunningham et al. 2020). However, public bodies relying on SNAP will not necessarily get the guidance they need in regard to the role of the production of animal-based food, and the policy options for addressing it.

For instance, SNAP does not clearly set out how transitioning away from industrial scale farming of animals is necessary to ensure achievement of Outcome One (Nature Connects) "Forests, grasslands, waters and other natural spaces create a rich network where plants and animals forage, feed and move as the climate changes". Currently, Scotland's tree-planting programme – which is vital both for mitigation and adaptation – is significantly off-target for the aim of 21% tree cover by 2032 (Ewing 2019). There is, however, sufficient non-arable farmland in Scotland where Scots pine could be re-established to sequester 670 - 1,280 Mt of CO_2 (Harwatt & Hayek 2019). Mature Scots pine woodlands can significantly reduce flood and landslide risks, as these deep-rooted trees slow water flow and improve soil retention. Tree cover cannot be restored to the extent needed to mitigate greenhouse gas emissions, without transforming the agri-food system of Scotland to be predominantly plant-based.

Dietary and land use change is also vital for the other Outcomes, including Five: "Scotland's international role supports climate justice and enhanced global action on adaptation". (See Q 1).

We now know that Scotland as a Global North country has already emitted significantly more carbon dioxide than the total global fair share for Scotland's people (Hickel 2020). Other global harms attributable to Scotland are highly likely to also be disproportionately high compared to its population. The Global Footprint Network estimates the full ecological ('eco') footprint per head in the UK to be 4.3 ha of land equivalent (2024 calculation, Lin et al. 2018, GFN 2024), when there is just 1 ha per person available globally. Nearly half (47%) of Scotland's environmental harms occur outwith Scotland, with a biocapacity overshoot (harms that cannot be offset within Scotland) of 25% (GFN 2024). By adopting a leadership role in the plant-based agri-food transition, Scotland can help to minimize its impact and rebalance its ecological debt (Poore & Nemecek 2018).

Therefore, Scotland has a proportionately greater responsibility to make repair and reduce future harms, including to reduce GHG emissions and draw down GHG, than a simple per capita basis. These actions must be based on Scotland's full consumption carbon footprint accounting for global trade and all significant Scope 3 emissions, not purely Scotland's territorial emissions.

The scale and rapidity of climate action now required rule out any 'business as usual' scenario, including for Scotland's land and food sectors. A plant-based agri-food transition, restoring spared lower grade agricultural land to natural tree cover maximises climate adaptation, and contributions to a just transition through improving Scotland's food security and public health (Harwatt & Hayek 2019).

References

Cunningham et al. 2020, "Securing a green recovery on a path to net zero: climate change plan 2018–2032 – update" Part 3 Chapter 6 Land Use, Land Use Change and Forestry. 2020, Cunningham R et al. ISBN 1-80004-430-5
https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/ (accessed 2025-05-05)

Ewing 2019, Scotland's Forestry Strategy 2019–2029, 2019 Ewing F ISBN 1-78781-558-7
https://www.gov.scot/publications/scotlands-forestry-strategy-20192029/ (accessed 2025-05-05)

Harwatt & Hayek 2019, Eating away at climate change with negative emissions: Repurposing UK agricultural land to meet climate goals (2019), Harwatt, H & Hayek, M
https://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93%E2%80%93Harwatt-Hayek.pdf (accessed 2025-05-01)

Hickel 2020, Quantifying national responsibility for climate breakdown: an equality-based attribution approach for carbon dioxide emissions in excess of the planetary boundary

9 Do you have any other comments about the guidance provided in this chapter about complying with the second duty?

Please give us your thoughts. For example, are there any gaps or are there ways that you think it could be improved.:

There are opportunities to implement a plant-based transition for urban areas that also brings adaptation benefits.

Increasing plant-based urban agro-forestry can help improve food security and public health for all including multiply marginalised communities (with numerous protected characteristics) in anticipation of climate change and other agri-food shocks (Gunapala 2025).

Increased plant growth, including trees, in urban areas is also likely to reduce air pollution and heat-related illness and death (Wu et al 2025).

These actions are particularly important and accessible for Local Authorities, and can help them to meet local, sustainable, plant-based food procurement needs.

References

Gunapala 2025, Urban agriculture: A strategic pathway to building resilience and ensuring sustainable food security in cities. 2025 Gunapala R et al., Farming System, https://www.sciencedirect.com/science/article/pii/S2949911925000140 (accessed 2025-05-06)

Harwatt & Hayek 2019, Eating Away at Climate Change through Negative Emissions: Repurposing UK agricultural land to meet climate goals https://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93%E2%80%93Harwatt-Hayek.pdf

Henderson & Sampson submitted, The impact of higher uptake of plant-based diets in England: model-based estimates of health care resource use and health-related quality of life, Henderson N & Sampson C submitted, https://doi.org/10.1101/2023.12.26.23300536 (accessed 2025-05-06)

Nisbet T 2022, Designing and managing forests and woodlands to reduce flood risk, ISBN 978-1-83915-017-3 https://www.forestresearch.gov.uk/publications/designing-and-managing-forests-and-woodlands-to-reduce-flood-risk/ (accessed 2025-05-06)

Wu et al. 2025, Estimating the urban heat-related mortality burden due to greenness: a global modelling study, 2025, Wu Y, The Lancet Planetary Health https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(25)00062-2/fulltext (accessed 2025-05-06)

The third duty: acting in the most sustainable way

10 Having considered the content of the chapter, is it clear how public bodies should implement the third duty, to act in the most sustainable way?

No

Please give us your thoughts.:

Addressing the negative consequences of industrial scale farming of animals is essential to acting in the most sustainable way.

Public bodies must therefore evaluate how they can contribute to reducing those impacts. This should include through direct action such as procurement policy and planning permission, and indirectly through influencing the actions of others, for instance through pro-active encouragement of dietary change or restrictions on the advertising of unhealthy and environmentally damaging animal-based foods.

The Environment Strategy for Scotland states Scottish agriculture will play a key role in tackling the twin crises of climate change and biodiversity loss. Therefore, the Scottish Government needs to give, and follow, specific advice to public bodies on how to maximise their contribution to the plant-based transition for a just and sustainable future.

Proper environmental impact accounting, including of significant Scope 3 emissions, will empower public bodies in Scotland to collectively make much more sustainable choices in all areas that affect our eco-footprint including agri-food and land use systems.

Providing specific advice and examples in the Climate Change Duties guidance on how best to support a plant-based food system is key to helping public bodies operate as sustainably as possible. This would lead to many co-benefits - including for our health, the economy, animal welfare, equality, and education, which would all feed into Scotland's Good Food Nation Plan Outcomes.

If we are to create a sustainable society where everyone is able to enjoy a better quality of life, without compromising the quality of future generations, transitioning towards plant-based diets and food production is an essential step towards this. We have provided relevant policy recommendations under Q11 for public bodies to implement in order to help them act as sustainably as possible in this area.

References

Poore & Nemecek 2018, Reducing food's environmental impacts through producers and consumers. Poore J & Nemecek T (2018). Science, 360(6392), 987-992. https://www.science.org/doi/10.1126/science.aaq0216 (accessed 2025-05-02)

Springmann et al. 2016, Analysis and valuation of the health and climate change cobenefits of dietary change (2016), Springmann M et al. Proc Nat Acad Sciences USA, https://doi.org/10.1073/pnas.1523119113 (accessed 2025-05-06)

11 Do you have any other comments about the guidance provided in this chapter about complying with the third duty?

Please give us your thoughts. For example, are there any gaps or are there ways that you think it could be improved.:

Policy needs to change to coherently and consistently support the urgent transition away from industrial scale farming of animals.

At present, no government policy or guidance exists in Scotland to encourage, foster or manage the dietary transition towards a greater intake of plant-based foods, or to secure a reduction in industrial scale farming of animals. The Climate Change Committee does advise significant expansion of agroforestry (CCC 2025), which can be supported by the transition away from industrial scale farming of animals (Harwatt & Hayek 2019). Without this

guidance, the public sector will not have the framework it needs to act in the most sustainable way.

Other countries are already taking advantage of the opportunity presented by plant-based food and diets. Denmark, a country quite comparable with Scotland in climate and population, has already published a national Action Plan for Plant-Based Foods to begin the transition towards plant-strong diets which includes plant-based food service in public sector catering (Ministry of Food, Agriculture, and Fisheries of Denmark, 2023).

Portugal has also revised its climate plans to include a national strategy to promote consumption of plant protein alternatives as part of a low carbon diet, specifically highlighting legumes as a nutritious, cost-effective and sustainable plant protein (European Commission, 2024).

The EU Strategic Dialogue on the Future of Farming has recommended that the EU develop a plant-based action plan by 2026 (EVU, 2024). Switzerland has also very recently introduced a national plan to boost consumption of plant-based foods (Swiss Confederation 2025).

Scotland has the capacity and opportunity to provide leadership towards the plant-based solutions needed to tackle the ongoing global food security, climate change and public health crises. Therefore, it must match and go beyond other countries' progress.
The Vegan Society has proposed a suite of pragmatic government policies to promote this transition and ultimately reduce climate emissions and support the government in reaching many of its policy targets. (The Vegan Society 2024). Those relevant to public bodies and this guidance are outlined below.

a) Capitalise on the health benefits offered by plant-based diets

As discussed in Qs 2 and 8, a significant co-benefit of a transition towards more plant-based diets is improvement in public health. Public bodies can promote these benefits through multiple actions, as outlined here, and those engaged in health services can specifically facilitate them through food procurement and provision.

A "plant-based by default" approach to catering in healthcare has been shown to be highly effective. This is the principle that healthy, balanced and culturally appropriate plant-based meals should be offered to anyone using these catering services (staff, visitors and patients) as the default, while meat, dairy & egg options are available on request. The policy has been adopted successfully in 11 New York hospitals, with greater than 90% satisfaction, 60% of patients sticking with the plant-based meal option, a 36% reduction in food-based emissions and USA$0.59 saving per meal [NYC Health and Hospitals 2024]. Adopting this approach in Scotland will cut greenhouse gas emissions, and normalise healthy balanced plant-based options, while retaining user choice and satisfaction. The plant-based by default approach is now being extended, with 400 US hospitals expected to be implementing the policy by 2026 (Greener by Default, 2025).

Some NHS service providers in the UK are beginning to trial this approach and NHS Scotland can facilitate national uptake through promotion of the scheme and by providing leadership direction, as well as financial and logistical support. The campaign by health professionals to introduce this policy in the UK is 'Plants First Health Care', working with Greener by Default [Plants First Healthcare 2024].

A more comprehensive plant-based offer in NHS catering will also boost the proportion of plant-based foods and ingredients purchased through procurement. This will also normalise healthy plant-based options for the people who eat there, who are likely to then influence their households and families to do the same.

b) Capitalise on the economic opportunity presented by plant-based foods

Outcome 4 of Scotland's Good Food Nation Plan is dedicated to making Scotland's food and drink sector prosperous, secure and resilient. Investing in a plant-based food system can generate massive economic benefits. UK-wide, a recent analysis found that eating more UK-grown fruit and veg could boost the economy by £2.3 billion, create over 23,000 jobs, raise farm incomes by 3% and surpass the total economic contribution from pork production. (Green Alliance, 2025).

Developing and manufacturing plant-based foods and alternative proteins means high productivity jobs in research, manufacturing and production, as well as farming jobs, estimated to potentially bring £6.8bn and create 25,000 jobs by 2035 in the UK (Green Alliance, 2023). A sustainable plant-based transition would therefore support Scotland's agricultural careers policy which aims to encourage diversity and change in the farming and agriculture sectors in order for it to be representative of modern, Scottish society which now has c.110,000 people (2%) identifying as either vegan or following a plant-based diet (The Vegan Society, 2024).

Plant-based ingredients can also reduce catering costs by c. 30% compared to meat-based offerings, as well as decreasing GHG emissions by 84% (Nicholles and Bryant, 2024). Therefore, plant-based catering should be prioritised in Scotland's Public Procurement Strategy, which encourages public bodies to broaden their response to the climate emergency, is a low-emission solution that supports Scotland's Net Zero ambitions.

For Scotland to capitalise on the economic growth of the plant-based sector and strive to be a leader in alternative proteins, there must be more investment and set regulations to level the playing field. This is necessary to allow farmers to more easily transition from away from industrial scale farming of animals to protein crop farming or other forms of sustainable land management. For example, increasing support and funding in R&D would help to drive innovative growth in the plant-based market, improving taste, flavour and nutrition.

With regards to plant-based food products, public bodies such as FSS, The Scottish Food Commission and Scotland Food & Drink should review restrictions around terminology and encourage price parity in retail and out-of-home sectors. Scotland's Food Standards Agency should also develop a harmonised and consistent mandatory food labelling system to describe the environmental impacts of food products.

c) Supporting farmers in a just transition away from industrial scale farming of animals

Outcome 2 of Scotland's Good Food Nation Plan involves improving animal welfare whilst supporting net zero ambitions and restoring and regenerating biodiversity. It is a widely held ethical value in Scotland that it is wrong to cause harm unnecessarily. Causing unnecessary suffering – harm to other

humans or non-human animals – is particularly to be avoided. These principles are considered in almost all human societies. In Scotland, the UK, Europe and elsewhere, our concern for the suffering of animals is acknowledged by our social, political and legal treaties and welfare laws. We know they are sentient, feel pain and suffer, and in many cases, are sapient too. The Sentience Act (2022) section 2(2) also requires that the government gives all due regard to the ways in which [a] policy might have an adverse effect on the welfare of animals as sentient beings. However, all forms of farming of animals have cause harm, from separation of young from their parents, to the killing of animals long before their full healthy lifespan. Eliminating animal farming would therefore not only benefit the environment, but would reduce levels of animal suffering in Scotland.

Public bodies such as NatureScot, SEPA and the Scottish Land Commission must be given sufficient guidance to help them support farmers in the transition away from harmful forms of agriculture. Firstly, a realistic land use plan is needed to support the growth in demand for plant-based crops, grow more fruit, veg and legumes in the UK and manage a reduction in industrial scale farming of animals. Reducing the consumption of animal-sources food and increasing the uptake of plant-based foods would free up crop land, allowing for the development of diverse agroecological production initiatives including plant-based protein crops (Parlasca and Qaim, 2022). Moreover, this freed-up land that is converted back into grassland or forest, and other sustainable uses, could play an important role in carbon sequestration, improving biodiversity and restoring the ecosystem, as well as helping farmers.

Secondly, public bodies such as further education and agricultural colleges can provide education and practical support on organic and nature-based forms of stock-free farming, to empower farmers with the knowledge and skills to confidently transition away from harmful methods of agriculture. This could include providing advice and support on stock-free growing, conversion planning, essential machinery and equipment, useful supply names and suggested cropping plans. Public bodies such as further education and agricultural colleges can promote methods of transition to plant-based sustainable farming methods particularly suited to the climate, terrain and culture of Scotland.

Lastly, local authorities can use their planning systems to limit or prevent the development of intensive animal farming, due to its attendant environmental impact, nuisance to communities and other relevant reasons.

d) Prioritising healthy and sustainable plant-based foods in public procurement

The public sector should use the procurement process as a lever to prioritise health and sustainability by having tasty and balanced plant-based dishes as the default on their menus, maintaining consumer choice with a guarantee of at least one nutritious vegan option on every public sector menu. Increasing the accessibility and availability of plant-based food is crucial and can reap many benefits, as outlined above.

The public sector should also make it easy for people to choose a vegan lifestyle, by supporting vegans and promoting veganism as a positive choice for the benefit of people, animals and the planet.

e) Promoting equality & inclusion in Scotland

A plant-based food system is beneficial for many, not just vegans. Many individuals and groups choose not to consume animal products for their health, the environment, dietary preferences and/or religious or cultural beliefs. By supporting plant-based food system - whether that be through catering in schools, hospitals and councils; price parity in the food supply chain; or educating healthcare staff on vegan diets and nutrition - more people would have access to what they need to secure a better quality of life, which in turn would benefit society long term.

Particular attention needs to be paid in Scotland by public bodies to both the significant numbers of people in socioeconomically marginalised groups, and those in more physically remote locations. It is important that everyone be empowered to have financial and practical access to suitable fortfiedfortified foods, including health-promoting plant-based alternatives to familiar animal-based alternatives.

f) Fostering a sustainable education system

A plant-based food system would also support the Scottish Government's Schools policy on health and wellbeing, which states, "Health and wellbeing is also about ensuring that pupils are able to make the most of their educational opportunities regardless of their background [...] As part of health promotion, schools are required to provide food which meets strict nutritional standards, given the major benefits these have for pupils' current and future health. The standards call for a variety of dishes available so pupils learn about making healthy choices about what they eat." The health benefits of plant-based diets would ensure all pupils have access to healthy and sustainable food.

Schools should therefore be given specific advice on implementing sustainable, plant-based catering and reforming the education system where needed to ensure students have the opportunity to learn about veganic farming methods and sustainable farming careers.

As previously mentioned, a plant-based food system would provide many job opportunities which in turn could encourage more students to uptake learning courses associated with nature-friendly farming and sustainable agriculture. The education system would benefit from an inclusive approach where agricultural courses offer plant-based pathways – focusing on soil health, organic crop production, vertical farming or plant-based innovation – ensuring students can meet learning objectives without compromising on their beliefs.

References

Brighter Green et al 2024, The just transition from industrial animal production to equitable, humane and sustainable food systems, 2024 White Paper, https://www.biologicaldiversity.org/programs/population_and_sustainability/pdfs/a_just_transition_white_paper_final.pdf [accessed 2025-05-09]

CCC 2025, Scotland's Carbon Budgets "Action will increasingly be required in predominantly devolved policy areas to hit the Net Zero 2045 target and the proposed carbon budgets. " https://www.theccc.org.uk/publication/scotlands-carbon-budgets/ [accessed 2025-05-23]

Clark, M.A., Domingo, N.G.G., Colgan, K., Thakrar, S.K., Tilman, D. et al., 2020. Global food system emissions could preclude achieving the 1.5° and 2°C climate change targets. Science 370(6517), 705–708. Global food system emissions could preclude achieving the 1.5° and 2°C climate change targets |

Science [accessed 2025-05-09]

DGE 2024. DGE Nutrition Circle, https://www.dge.de/english/dge-nutrition-circle/ [accessed 2025-05-09]

European Commission 2024. Portugal: National Energy and Climate Plan 2021 – 2030, f12fd5f8-605b-481c-9690-6b86fe2d48e3_en [accessed 2025-05-08]

EVU 2024. EVU welcomes proposal for an EU Action Plan for Plant-based Foods by 2026 [online] Available at: EVU welcomes proposal for an EU Action Plan for Plant-based Foods by 2026 - European Vegetarian Union [accessed 2025-05-08]
Food Standards Scotland 2021.Modelling the impact of reductions in meat and dairy consumption on nutrient risks and disease risk: summary briefing https://www.foodstandards.gov.scot/downloads/Summary_briefing_-_Modelling_the_impact_of_reductions_in_meat_and_dairy_.pdf
GFI 2023. State of global policy. Public Investments in alternative proteins to feed a growing world. https://gfi.org/wp-content/uploads/2023/01/State-of-Global-Policy-Report_2022.pdf [accessed 2025-05-08]

Green Alliance 2023, Appetite for change, Policy insight, https://green-alliance.org.uk/wp-content/uploads/2023/08/Appetite_for_change.pdf (accessed 2025-05-06)

Green Alliance 2025, The strong economic case for expanding UK horticulture, Green Alliance briefing, https://green-alliance.org.uk/briefing/the-strong-economic-case-for-expanding-uk-horticulture/ (accessed 2025-05-06)

Greener by Default 2025. Greener by Default Announces Expanded Partnership with Sodexo to Offer Plant-Based Meals at 400 U.S. Hospitals https://www.greenerbydefault.com/blog/gbd-sodexo-hospital-expansion-2025

Harwatt & Hayek 2019, Eating away at climate change with negative emissions: Repurposing UK agricultural land to meet climate goals (2019), Harwatt, H & Hayek, M https://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93%E2%80%93Harwatt-Hayek.pdf (accessed 2025-05-01)

Henchion, M., Moloney, A.P., Hyland, J., Zimmermann, J. and McCarthy, S. 2021, Review: Trends for meat, milk and egg consumption for the next decades and the role played by livestock systems in the global production of proteins. Animal 15, 100287. Review: Trends for meat, milk and egg consumption for the next decades and the role played by livestock systems in the global production of proteins - PubMed (accessed 2025-05-06)

Henderson & Sampson 2024 (preprint) medRxiv 2023.12.26.23300536; doi: The impact of higher uptake of plant-based diets in England: model-based estimates of health care resource use and health-related quality of life https://www.medrxiv.org/content/10.1101/2023.12.26.23300536v1 (accessed 2025-05-23)

The Vegan Society 2024, Vegan, plant-based and other dietary trends in the UK, IPSOS survey, https://www.vegansociety.com/news/news/nationwide-trends-highlight-growing-shift-toward-plant-based-diets (accessed 2025-05-06)

Ministry of Food, Agriculture, and Fisheries of Denmark 2023. Danish Action Plan for Plant-based Foods, pp. 5 - 38 [online] Available at: Danish-Action-Plan-for-Plant-based-Foods.pdf (accessed 2025-05-06)

Morgenstern, S., Redwood, M. and Herby, A. 2024. An innovative program for hospital nutrition, American Journal of Lifestyle Medicine, 19(2), doi: https://doi.org/10.1177/15598276241283 1 (accessed 2025-05-06)

Neufingerl & Eilander 2023, Nutrient intake and status in children and adolescents consuming plant-based diets compared to meat-eaters: a systematic review, Nutrients, 15(20), https://doi.org/10.3390/nu15204341 (accessed 2025-05-06)

Nicholles, B and Bryant, C. 2024, Climate-conscious & cost-effective: A case for plant-based university catering, Bryant Research report, https://bryantresearch.co.uk/insight-items/climate-cost-university-catering/ (accessed 2025-05-06)

One Health High Level Expert Panel, Adisasmito, W.B., Almuhairi, S., Behravesh, C.B., Bilivogui, P., Bukachi, S.A. et al. 2022. One Health: A new definition for a sustainable and healthy future. PloS Pathogens 18(6), e1010537. One Health: A new definition for a sustainable and healthy future | PLOS Pathogens. (accessed 2025-05-06)

Parlasca, Martin C.and Qaim,M. 2022. Meat Consumption and Sustainability, Annual Review of Resource Economics,14:1, 17-41

Statista 2024, Veganism and vegetarianism in the United Kingdom – statistics & facts, https://www.statista.com/topics/7297/veganism-in-the-united-kingdom/#t (accessed 2025-05-06)

Swiss Confederation 2025 https://www.blv.admin.ch/blv/de/home/das-blv/strategien/schweizer-ernaehrungsstrategie.html (in German) - see information in English at https://www.greenqueen.com.hk/switzerland-plant-based-diet-food-waste-national-nutrition-strategy/, accessed 7 May 2025

The Vegan Society, 2017. Solutions for the farm of the future, pp. 23-27 [online] Available at: https://www.vegansociety.com/sites/default/files/Grow%20Green%202%20Full%20Report_0.pdf (accessed 2025-05-06)

The Vegan Society 2024. The Vegan Society Policy manifesto https://www.vegansociety.com/sites/default/files/uploads/downloads/The_Vegan_%20Society_Policy_Manifesto.pdf

UNEP, 2022. Emissions Gap Report 2022. United Nations Environnent Programme, Nairobi. Available at: EGR2022 (1).pdf (accessed 2025-05-06)

Verkuijl, C. et al 2023. A just transition in animal agriculture is necessary for more effective and equitable One Health outcomes. CABI One Health. A just transition in animal agriculture is necessary for more effective and equitable One Health outcomes (accessed 2025-05-06)

Reporting of scope 3 emissions

12 To what extent do you agree or disagree with the proposed baseline reporting of the scope 3 emission categories outlined in section 8.3.5.1 of the guidance and in the drop down section below?

Strongly disagree

Please provide any additional comments below.:

The baseline expectations should include emissions from purchased food. As described above, switching procurement to plant-based foods can bring significant mitigation benefits and this must be reflected in the mandatory reporting, under the purchased goods category.

Baseline expectations should also include land use emissions for any public body owning or managing land beyond that used for its immediate requirements (such as office space). Land use change is expected to play a significant role in mitigating climate change (Climate Change Committee 2025) , including in particular land use associated with animal agriculture. Public bodies responsible for any agricultural land should therefore be expected to report on the Scope 3 emissions arising from their management of it.

This is a powerful potential win-win-win area, and lack of knowledge and transparency in reporting of these Scope 3 emissions is severely hindering Scotland from fulfilling climate change obligations and just transition goals.

References

Climate Change Committee 2025, Scotland's Carbon Budget
https://www.theccc.org.uk/wp-content/uploads/2025/05/Scotlands-Carbon-Budgets-1.pdf (accessed 2025-05-23)

13 Do you think that any other categories of scope 3 emissions should be included in the recommended baseline for reporting, where these are relevant and applicable? Please tick all that apply.

Purchased goods, works and services, Capital assets (e.g. construction), Upstream transportation and distribution, Upstream leased assets, Downstream transportation and distribution, Processing of sold products, Use of sold products, End-of-life treatment of sold products, Downstream leased assets, Franchises, Investments

If you ticked any of the categories of scope 3 emissions above, please provide an explanation. This field can also be used for any other comments related to this chapter.:

The climate impacts of animal farming and consumption of animal products are relevant not just to the agri-food sector, but also as Scope 3 emissions for finance (e.g. in land & business investments), fashion (commodity textiles of animal origin), property (footprint from processing & sale of commodities of animal origin), health and education.

Overall reflections

14 Do you think that the guidance fulfils its stated purpose of providing support to public bodies in putting the climate change duties into practice?

No

Please provide further comments below.:

As extensively argued throughout this consultation response, further guidance pertaining to the transition away from industrial scale farming of animals, and towards plant-based diets should be included to ensure that this critical area of climate action is not neglected.

15 Do you have any further comments about the guidance?

Please give us your thoughts. For example, are there any gaps or are there ways that you think it could be improved. :

Public bodies are acting in the context that is provided in large part by the Scottish Government. Significant distortions to how biosphere management and land use can operate sustainably are enforced by inappropriate Scottish laws, regulations and guidelines over which the Scottish Government has considerable influence.

Agricultural tenancies and funding are still locking in unsustainable, greenhouse gas intensive (GHG) management models. Methane emissions are enforced by requirements to keep large numbers of animals in farming, which occur in many agricultural tenancy and grant conditions with e.g. 'minimum sheep stocking densities'. Carbon dioxide sequestration is also inhibited by guidelines that do not recognise 'stock-free' agro-forestry and other tree regeneration techniques. The transition from animal-based to plant-based land management, including the return of trees to much of Scotland, is a vital part of achieving climate change duties (Harwatt & Hayek 2019).

Therefore, public bodies – through for example food procurement, appropriate Scope 3 emissions reductions, and financial involvement with land use – need the Scottish Government to ensure all land managers can sequester carbon and reduce methane, NO2 and other GHG emissions. The rules of agricultural land use, including tenancies and funding, must empower the plant-based transition by never enforcing the keeping of animals in farming, and by recognising agro-forestry amongst other approaches.

References

Harwatt & Hayek 2019, Eating away at climate change with negative emissions: Repurposing UK agricultural land to meet climate goals (2019), Harwatt, H & Hayek, M
https://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93%E2%80%93Harwatt-Hayek.pdf (accessed 2025-05-01)

About you

What is your name?

Name:
Claire Ogley

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
The Vegan Society Reg. Charity No: SC049495 (Scotland)

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

Further information about your organisation's response

Please add any additional context:

The Vegan Society initiated a study in partnership with the Office of Health Economics on the health and economic impacts of higher uptake of plant-based diets in England. Extrapolating the results to the population of Scotland, the research implies that NHS Scotland could save c. £640 million each year in avoided health problems, if everyone adopted a vegan-suitable diet. This has been submitted for publication as Henderson & Sampson (2024).

We have also reviewed published evidence and expert opinion on dietary change and climate change emissions targets, and policies in action from EU to South Korea which support such dietary change (The Vegan Society 2024). We found that, with suitable support, farmers, food producers, food retailers, public sector caterers and food consumers across Scotland can benefit from the shift towards a more sustainable, plant-base agri-food system.

As a membership organization which works in Scotland, we partnered with Go Vegan Scotland (a not-for-profit volunteer group) to explore better plant-based public procurement in Scotland in 2019. Their 2018 Petition to the Scottish Parliament, calling for a guaranteed plant-based option on all public sector standard menus in Scotland had 8,778 signatories. This research showed that climate change adaption and mitigation, public health, inclusion and equality in Scotland can all be significantly supported by always having a good vegan-suitable option on every public sector menu in Scotland (Scotland Food Procurement Briefing 2019).

We partnered with researchers at Harvard to investigate how to repurpose land currently used to support industrial scale farming of animals to help achieve climate goals whilst including food security in the UK including Scotland (Harwatt & Hayek 2019). This gave scenarios our obligations for achieving a climate-stable world requires a Scottish agri-food system transition towards agro-forestry and crops grown for direct human consumption.

References

Briefing: Dietary Change and Emissions, The Vegan Society 2024
https://www.vegansociety.com/sites/default/files/uploads/downloads/Dietary%20Change%20and%20Emissions%20Briefing_The%20Vegan%20Society_2025.pdf (accessed 2025-05-23)

Harwatt & Hayek 2019, Eating away at climate change with negative emissions: Repurposing UK agricultural land to meet climate goals (2019), Harwatt, H & Hayek, M
https://animal.law.harvard.edu/wp-content/uploads/Eating-Away-at-Climate-Change-with-Negative-Emissions%E2%80%93%E2%80%93Harwatt-Hayek.pdf (accessed 2025-05-21)

Henderson & Sampson 2024 (preprint) medRxiv 2023.12.26.23300536; doi: The impact of higher uptake of plant-based diets in England: model-based estimates of health care resource use and health-related quality of life https://www.medrxiv.org/content/10.1101/2023.12.26.23300536v1 (accessed 2025-05-23)

Scotland Food Procurement Briefing 2019, Policy Briefing: Plant-based public sector catering for Scotland, 2019 The Vegan Society and Go Vegan Scotland https://www.vegansociety.com/sites/default/files/uploads/downloads/C4E_Scottish%20Policy_V3.pdf (accessed 2025-05-23)

Do you work for, or are you responding on behalf of, a Scottish public body subject to the climate change duties?

No

Not Answered

Not Answered

Is your organisation a public body subject to the mandatory annual reporting on compliance with the climate change duties under the Reporting Order, i.e. the public bodies climate change duties reporting?

No

Not Answered

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email:
policy@vegansociety.com

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent