

## CONSULTATION QUESTIONS

1: Should the scope of the new food body extend beyond the current scope of the FSA in Scotland? If yes, what specific extensions of scope would you suggest, and why?

- Yes. The FSAS should cover all aspects of food from farm to fork and all aspects of the labelling including nutritional information. I feel we should also feed into Zero Waste strategies by working with manufacturers on reducing packaging. The doubling up of visits to farms by both EHO/TSO's and SGRPID officers should only be carried out by one or other organisation, I would imagine EHO/TSO would be best as they have the enforcement powers.

2: Should the new food body and the Scottish Government continue the arrangements for independent and partnership work on diet and nutrition set out in Annex A? If not, what changes would you suggest, and why?

- Yes the information in Annex A sounds good however the only point to note is that it would appear that both the Scottish Government (SG) and the FSA are overlapping on some aspects. Would it not be better that the SG simply went into a role of policy making and steering legislation from the information gained from FSAS and the NHS boards who would drive forward the implementation of the policy.

3: Are there any additional roles, responsibilities or functions in respect of diet and nutrition that you think the new food body could take on to help deliver an improvement to the health of the people in Scotland? Please give details and reasons.

- Closer NHS partnerships, training of EHO's or other enforcers to drive forward the nutritional issues as I presume the NFB will need someone to enforce these issues.

4: What steps do you think could be taken to ensure the new food body is able to access the best available independent expert advice it needs to underpin its work on food safety and public health nutrition in Scotland? Please give reasons.

- Independent, credible and accurate scientific research is probably the most important aspect of any scientific data we only have to look at MMR and the issues caused by dubious research. Global as well as local research would need to be inspected to see if there are specific trends or if local research was off the mark then why this has happened. Consideration must always be given to implementation after the evidence is accepted which does not always appear to occur at present.

5: Do you consider that the new food body should focus its research and surveillance activities on issues that are particularly pertinent to Scottish citizens or should it also contribute to science and evidence programmes on wider issues which have relevance to the UK as a whole? Please give reasons.

- I feel research should be global not just local. I know that Scotland has its own issues but obesity is a pandemic issue as are many of the other aspects.

6: Do you agree that the new food body should be responsible for the coordination of all Scottish Government funded research on food safety and public health nutrition? What steps could be taken to raise the profile of the new food body as a research funder across the UK and beyond? Please give reasons.

- Yes the NFB should be completely responsible for all aspects of research and food safety. Promoting this via the universities, LA's, SEPA, DEFRA etc etc also media advertising in specialised magazines, electronic media, twitter, facebook, on the website etc.

7: Do you have any further suggestions for how the new food body could establish a strong independent evidence base for food safety, food standards and nutrition policy? Please give reasons.

- No

8: Do you consider that the new food body would require any further statutory powers, in addition to those that the FSA already has, to equip it to deal effectively with incidents such as the recent horse meat substitutions, and to prevent such incidents happening? Please give reasons.

- There appeared to be a lot of lag time involved with the recent horsemeat scandal and issues that involved working out who was responsible for what aspects. This was not just confined to England but was UK wide. There needs to be much better integration into aspects such as port control where food travels freely, without any inspection, through ports and into the food chain at abattoirs etc. then onto manufacturers. The NFB should help promote grown, slaughtered, manufactured local and if possibly aid in subsidising suppliers as I believe it is not possible to penalise imports due to this countries open market policies. If this occurred the NFB would be able to assure the food from farm to fork is not just safe but 'NFB guaranteed safe'.

9: Do you have any further comments about how the new food body might ensure that it can deal effectively with contraventions of food standards and safety law? Please give reasons.

- No.

10: Should the new food body take on any roles and responsibilities not currently fulfilled by the FSA in Scotland? If yes, please give details and reasons.

- My personal opinion is that EHO's should no longer be part of LA's. There is far too much disjointedness and 'hostility' for better terminology with a 'them and us' mentality. We are not all working together for better public safety. We even have issues at present where one LA will ask for a certain aspect of enforcement and another LA disagrees. This is incredibly confusing for the retailer/ trader especially if they have business in more than one LA. If all enforcement was under 1 governance rather than 32 with competent people at all levels then enforcement would be much more accurate and cohesive.

11: Please tell us your views about these suggestions for changes to the delivery of official food and feed controls. Do you think that the new food body should work in a different way with local authorities? Please give reasons.

- As above I feel the NFB needs to take on the entire remit of food from farm to fork including all research, legislation and policy making and right through to enforcement and auditing of premises. 1 body 1 consistent approach.

12: Do you have any views on how the new food body should assure delivery of official controls and meet the relevant EU obligations? Please give reasons.

- The auditing process should be carried out by trained lead auditors up to one of the ISO standards such as 9000, 10000 or 19000 series. This should aid in consistency. If the NFB took on the full role as described above auditors should probably be placed within the SG or an independent auditor could be employed from the IRCA. The auditors would then have a structured and accurate framework to stick to when auditing the LA or NFB.

13: Are there any additional or alternative relationships that you would suggest that would help the new food body achieve the Scottish Ministers' objective of longer, healthier lives for the people of Scotland? Please give details and reasons.

- No other additional relationships other than those mentioned.

14: Do you have any suggestions about how the new food body can engage effectively with consumers, both in developing policy and providing information and advice?

- An area for voting on the website or suggesting aspects of food. The number 10 Downing St website has been very interesting in this respect over the years.

15: Do you agree with the suggested approach to ensuring the new food body's independence from Government and the food industry? Do you have any further suggestions for how the new food body could best establish and maintain its position as an arms length part of Government? Please give reasons.

- I do agree it is very important to keep its true independence. As has

happened and always will happen politicians do like to try and get their input into areas that they are not professionals in. I have seen this at local authority level right up to government level. A mechanism to reject these inputs is paramount especially if not scientifically founded. There should also be the ability of members of the public and industry to be able to present their findings and allow input into policy etc. again if they have firm scientific proof that can be scrutinised.

16: Do you have any further comments, or suggestions, on the creation of a new food body for Scotland that are not covered by any of the previous questions?

- This is an opportunity to carryout a major overhaul of the way the system is at present and it needs to be a bold step to carryout a full restructuring of the system. There is a major lack of cohesion between LA's and the FSA at present and inconsistency between LA's. There is also still a council employee mentality of hard workers vs lazy workers and the new NFB needs to be run more like a private company where you are employed on your ability not on the time served. The NFB needs to get away from the PI mentality and start themed inspections etc. and start to investigate areas of what is going into our food rather than ticking boxes on the food hygiene aspect. Full farm to fork traceability needs to be implemented properly and I personally feel driving forward born, bread, slaughtered, processed and consumed locally is vitally important to drive forward the local UK and Scottish industry in food.