

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. We believe that the new food body should have enhanced powers to audit and regulate food manufacturers in a proactive fashion rather than the FSA's current reactive fashion. It should have greater powers to demand accurate, clear information from manufacturers and to be able to pass this on to stakeholders.

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?

- It may be effective for the new food body to take over as the umbrella agency for the promotion of clear, consistent and far-reaching public messages about matters of food, nutrition and health. At the present time it is felt that messages come out from many agencies, sometimes with confusing information.

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.

- Some regulatory powers over food marketing could be useful, as marketing often undermines public health and nutrition messages.
- Oversight/standardisation of food labelling, to enable consumers to make better informed nutritional comparisons.
- Provision of clearer, more consistent information for parents (both antenatal and during the early years) regarding infant and child feeding—including breastfeeding, weaning and supporting healthy eating habits in young children.
- The new body needs to thoroughly examine the breadth of initiatives that are being undertaken at national, regional and local levels in Scotland currently, many of which are effective only for small groups of people or for which have short-lasting impacts. The overall trend continues to be toward poor diet, convenience foods and obesity. Real efforts must be made to understand the holistic social, cultural and economic reasons for this. For example, there is a very common belief that it is less expensive to eat processed convenience foods than it is to cook from scratch. This belief is often the result of a lack of knowledge and skills about food and cooking. In the experience of the Midlothian Food and Health Alliance partners, a lack of cooking skills is one of the key issues

affecting the health of families on an intergenerational basis. Investment in cookery skills should be a key initiative—both through schools via increased opportunity to study Home Economics—and also in non-school learning settings (CLD and the voluntary sector). There is a notable lack of funding for this provision, and this could be an area for increased investment.

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.

- The right structures for governance of the new body need to be put in place. The organisation needs to be led by individuals with proven expertise in the breadth of issues affecting diet, nutrition and health—including food safety, nutrition, marketing, and also the socio-cultural and economic issues affecting food choices and behaviour. The agency needs to be evidence-led and its policy directions must be evidence based. It should have the power to advise Scottish Government but ministers should not be involved in the governance of the organisation.

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.

- All aspects of food production, manufacturing, labelling and marketing are now global, and many of the health trends affecting Scotland are not unique to Scotland. Research and surveillance must reflect this and should be able to learn from good practice across the globe. However, we must reflect on this research and surveillance, as well as using our knowledge of local socio economic and cultural issues to address issues that are particularly problematic in Scotland or local areas within Scotland.

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, this would be useful. The key to this however is further reaching dissemination of research, to ensure that messages are reaching the agencies that are supporting consumers within their communities: NHS staff, local authority staff and the voluntary sector. The new body should have a role to disseminate research broadly.

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.

- International, peer-reviewed research

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.

- See our answer to Question 1

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.

- Comments

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.

- Comments

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.

- Comments

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.

- Comments

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.

- Comments

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?

- Consumer engagement needs to focus on the realities of why people make particular choices around food. Messages need to be clear and accessible, not 'preachy' or seen to be targeted only at middle class audiences. There is a lot of good practice on the ground locally in terms of consumer engagement, so the new body should have a role to gather

this, review and disseminate.

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.

- Comments

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?

- Comments