

COMMENTS ON SCOTTISH GOVERNMENT

A HEALTHIER SCOTLAND: CONSULTATION ON CREATING A NEW FOOD BODY

The Royal College of Physicians of Edinburgh (“the College”) is pleased to respond to the Scottish Government consultation on A Healthier Scotland: Consultation on Creating a New Food Body.

The College has the following general comments on this topic:

The College recognises that no one agency could easily deal with food chain policy, from crop science to prevention of diabetes, and therefore it is essential to set out clear roles and the parameters for close liaison between agencies. The College also recognises that resources are constrained, and therefore duplication of effort should be avoided and partnership working is essential.

Any change of the balance of responsibilities should be based on criteria of effectiveness and efficiency of service delivery. Relevant policy in this area encompasses healthy weight in tune with healthy balanced lifestyle; prevention of many important physical and also mental ailments; the drive for health improvement and the vital need to tackle health inequalities.

The College has the following comments on specific questions:

Question 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?

Probably, yes. The FSA have strengths in nutrition science and public communication, however other strands of related interest such as health inequalities and overall health improvement are clearly connected. It is important that areas where the new food body could have a legitimate interest are defined and that there is a coherent remit for other agencies to discharge their responsibilities.

Question 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 College recognises FSA Scotland’s role and values, in particular its expertise in nutrition science and evidence. The College sees the role of the FSA as educating clinicians and the public, not only in the merits of safe and good nutrition but also the many and serious consequences of poor nutrition.

The College’s role in public health brings with it a wide range of expertise, from common food related diseases such as cancer and diabetes, to rare and serious diseases such as variant Creutzfeldt-Jakob Disease. Public health interfaces on nutrition are several, and the College, through the Scottish Health Action on Alcohol Problems, hosts expertise in this area. It also has a new commitment, with

the Scottish Academy of Medical Royal Colleges and Faculties, to address the problem of obesity and promote physical activity. The College has recently drawn on the work of FSA Scotland in this work stream.

Question 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.

The College welcomes FSA Scotland's strengthened research commitment. In the College's public health role it urges the FSA Scotland to encompass in its research strategy two key current interests:

1. Sustainability of the current and future food chain; and
2. Research on system influences for food production, processing and retailing that promotes an affordable and well marketed healthy balanced diet.

Question 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.

FSA Scotland has an established track record of sound research and surveillance. The strategy for these matters would best be carried out in partnership with stakeholders, including public health and clinical interests, focussing on the groups and communities in Scotland who face the greatest challenges in health protection and food safety, and in achieving a healthy balanced diet and longer, healthier lives.

Question 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.

The College, through its membership, recognises benefits from sharing common problems in nutrition- related disease across the globe, learning from both similarities and contrasts.

The food chain is a global concern, and Scotland sources food from around the world on a daily basis. It also exports food across the globe. Some foods produced in Scotland start life in other countries, or in transnational or international waters. FSA Scotland cannot limit its scope to concerns at country level, but needs to strengthen its links and interest by the most efficient means possible internationally. It would also make sense to continue to have strong links across the UK, and so ensure that the merits of UK-wide skills and safety mechanisms are put to best use.

Question 6: Do you consider 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

Answers to these questions lie in the amount of resource that will be available to the FSA and other research-funding bodies. Its profile and priorities will flow from these decisions. The principle of partnership, within Scotland and across the UK and beyond, is vital to commissioning and benefitting from research effectively. The span of interest in food chain research is considerable. Defining and agreeing roles and responsibilities is very important, as with all functions of FSA's work.

Question 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 further suggestions.

Questions 8-12

No comment.

Question 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.

The College wishes to sustain and strengthen good relationships with partners in food matters in Scotland, and in the quest to support Scotland to achieve its aspiration to lead longer and healthier lives. Partnership working is vital to achieving this set of aims.

The College believes that the potential for greater influence of health interests in food and nutrition should be part of a broad alliance that aims to improve balance for a healthy diet, and lower consumption of food and drink overall.

Question 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?

Through our network of healthcare professionals, the College is keen to work with the new food body and other connected organisations to help lift public awareness on issues of common interest.

Question 15: Do you agree with the suggested approach to ensuring the new food body's independence from Government and 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.

The College would support the need to represent strongly the interests of the experts, professionals, knowledge producers and brokers, the public and their representatives.

Question 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 consultation has been a good opportunity to engage in fresh discussion at a critical time for food, given recent consumer concern over standards and regulation, and the deteriorating economic circumstances of many people as prices for staple foods rise.

Diet, food and drink and overall calorie consumption in Scotland is demonstrably unhealthy. Effective and efficient arrangements that integrate food and drink as nutrition into overall, fair, health-focussed consumption mean that Scotland should see a falling burden of disease and poor health, and the best opportunity to ensure that all its citizens live longer healthier lives.

All College responses are published on the College website www.rcpe.ac.uk.

Further copies of this response are available from Lesley Lockhart (tel: 0131 225 7324 ext 608 or email: l.lockhart@rcpe.ac.uk)

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