

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?

Education is the key, accessibility of information – Specifically – the NHS in Scotland, local authorities, FSA, and educational institutes should all be singing from the same hymn sheets about health-food and nutrition. The more and wider spread the better. The vast majority of the population are intensely interested in the food they put in their own and moreover, their childrens mouths- when did we ever see so many different chef/dinner/kitchen garden/celebrity cooks/food travelogue TV programmes on national TV ? Trawl through any TV guide and you will find a half dozen minimum, not including repeats.. There is a huge window of opportunity for the Government and NGO bodies to drive home the health message about how good food and nutrition improves life and longevity and how bad diet and consumption limits lifestyle and lifespan. Maybe the Scottish Government should hire Ewan McGregor and Gerrard Butler as two hairy Scottish bikers going round Scotland filming healthy food messages.

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?

- Specifically on Annex A 9. “**Engaging**” with the food industry to **‘promote’** reformulation of food re; salt , fat and sugar reductions. Through **a self-reporting** framework to highlight reductions. Except this is so wide of the mark as to be utterly useless. Get real. Did the soft touch ‘hands ‘off’ self-regulation of the banks and financiers do us a good turn? Oh , wait....er did the ‘self-reporting’ self-regulation of the press/PCC stop the utterly disgraceful and shameful abuse and the stomach-churning exploitation of false hopes of Milly Dowler’s parents? Do you think the “FOOD INDUSTRY” will quietly roll over and let a new Scottish wide FSA body tickle its tummy?? No, neither did I. Don’t you think it is time to get hard, nasty and brutal with food companies that don’t mind feeding people horsemeat and LYING about it? No. No. What is the point of ‘regulation’ with one hand tied behind your back? Don’t you think, perhaps, what we put in our mouths on the say so of someone whose profit margin depends on our acquiescence and rosy belief that they are acting in our best interests and promoting ‘healthy’ alternatives is a bit naïve? I say a bit naïve, I mean irredeemably stupid. I say stupid, I mean totally blinkered. I say blinkered, I mean wake up and smell the coffee.....Take the scandal of supposedly healthy plant sterol products, margarines, drinks etc, which trumpeted the research that- yes! They do reduce cholesterol! Hey, they cost 2.5 times more £ than normal products, but , look, we are acting in your best interests!

While conveniently ignoring or at best minimising the , probably just as fascinating little snippet that the researchers had no qualms in sharing, but , hey, the food companies don't really want you to know about how sterols are poorly metabolised, accumulate in the body and have been indicated in Aortic Valve Stenosis! There, we'll lower your cholesterol,! we can help you avoid a coronary, hey! We'll just give you an MI instead!

The best treatment for "engaging" with the 'food industry' is one where they can be flung headlong into jail and fined massively for knowingly playing fast and loose with the food that a poorly educated and unaware buying populace are stuffing into their fat little faces- a bit of Robespierrean Terror concentrates the mind wonderfully. Oh, then , on the other hand- hey here's an incentive for actually genuinely promoting healthy food options- tax breaks- VAT exemptions- e.g. double cream bad....creme fraiche good....

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.

- Comments: Food labelling may have made some differences to a proportion of the population- at the risk of sounding élitiste, I would hazard to guess that it would help those better educated, or more aware disproportionately. A good example is the 'trade off' between identifying processed food content of « salt » as opposed to « sodium »- where the figure quoted for 'sodium' is typically 40% of the true 'salt' content- those with a scientific bent would therefore multiply the figure by 2.5 to arrive at the true 'salt' content of the food.. At the risk of sounding pedantic- education is the key- it may take a generation to change, but nothing will change without pan-industry/public service involvement in sharing and pointedly driving home as series of simple messages at a micro-social level.

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.

- 1. Redraw the parameters of public health research and dissemination- where e.g research funding for projects and enquiries should be increased by at least 67% i.e. 1/3 of funds for the research itself, including a proportion for ensuring watertight academic and peer review validity and relevance, and 2/3 for dissemination. What's the point of academic journals publishing valuable and valid research for other academic researchers to read, and once in a while the popular press gets wind of it and announces " boffins create new drug to treat....blah blah" and immediately trivialize and neuter the research. Spread the word far and wide, yes in academic journals, but , for example , why not

have a nice photogenic young medical/health researcher write up a blog or a 'research diary' in the popular press, growing an audience/readership with every blow by blow account of their daily/weekly efforts to, say, identify control of free radicals in the bloodstream. The EQUATOR network would be a good starting point, oh, and recruit Ben Goldacre to the Scottish Health Dept, he would be worth every penny.

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.

Then why bother setting up a distinct Scottish body? Re-invent the wheel while you're at it. 130,000 Scots people contracting food borne –i.e. Entirely Avoidable disease every year? That's a sold out Murrayfield,, twice! You're having a laugh?!.....Governments first duty is to the health , safety, security and well being of it's own people....or did I get that bit wrong?

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.

- Er...no. Vested interests aside, different research bodies will have different and varied agendas, programmes, and resources. The wider the spread of research and dissemination the better- purely scientific e.g. food scientists, inspectorates, public health researchers, generalist and specialist health issues needing research applications- e.g the inexorable rise in bowel cancer in male population, explanations for the increase in heart disease in west of Scotland female population, the generalist orientation to the symbiosis between diet and exercise etc...
- The new body should contribute to the commissioning and funding of Scottish health research. The *findings* should be disseminated across the UK, to infinity and beyond....

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.

- Cochrane reviews of meta analyses on the widest range of public health phenomena, replication studies on previous seminal or authoritative published studies, epidemiological data correlations with spread and incidence of disease and Scottish shopping/eating habits.....

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.

- The response of the FSA to the outbreak of the Horsemeat affair was criticised for being too slow, cumbersome and continually behind the curve, unable to act quickly to breaking events. Those criticisms may have reflected the level of public disquiet and concern, to put it mildly, over the whole matter, but it seems churlish and unfair to criticise the FSA ,as it could only follow it's mandatory regulatory and enquiry protocols, to do justice and to be seen to do justice to the whole matter, bound as it would be by legislative and procedural distractions, which , although cumbersome or bureaucratic, were deemed necessary by some committee at some point in the past. The best form of defence is offence- speed up and volumize the reactive-enquiry effort, or boost the inspectorate and monitoring teams. Give them a range of limited fast-acting executive and enquiry powers, backed by law, with the spectre of an extremely wide range of potential sanctions, up to and including liquidation for repeated offences, 360⁰ monitoring and 100% sampling for a defined period, or the bowel-clenching prospect of jail and massive fines . If a financial adviser can be jailed for up to 2 years or fined £50,000 for breaches, perhaps innocent, of contraventions of money-laundering laws, then the food industry needs a rod of lightning shoved up its fundament, where food and the public's health is concerned?

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.

- 3 strike policy- minor contraventions- 360⁰ monitoring and 100% sampling/testing for a defined period- say 2-3 months?
- Strike two- second contravention within , say, 12 -18 months resulting in all of number 1, plus -CEO, board members, those in charge of food safety, hygiene, production standards, staff training;- sacked and made to re-apply for their jobs-
- Strike 3- repeated offence of the SAME offence in a 2 year period- wave bye bye, hand over the keys and go and do something else because you are patently unsuitable to run a food company where the public health is at stake. Too brutal for you? Go compare with sanctions in the drug pharmaceutical industry. Or don't we think the public's health and safety is important enough to disturb the food big business in its drive for profit?

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.

- Do more to promote Scotland's larder as natural fresh and healthy- west coast seafood is exported at a rate of knots , foreign importers cannot get enough of it. Aberdeen Angus is universally recognised as a watch word for quality. Here's a wee quiz- find and match the second word to the first and see how long it takes- get the office to do it in 2 teams and see how long it takes:

Aberdeen Angus_____

Arbroath_____

Forfar_____

Moffat_____

Ayrshire_____

Loch Fyne_____

Dunsyre_____

Galloway_____

Aberdeen_____

Dundee_____

Selkirk_____

Tweed_____

Stornoway_____

And so on.....

Scotland has a natural larder, and my understanding of the laws of economics is if volume of sales goes up, prices come down....

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.

- A new Scotland wide FSA should work closely with local authorities to boost and stiffen the health and safety inspectorate and monitoring function- they SFSA should provision a training division in conjunction with Queen Margaret University, Edinburgh (if they don't already do so) and provide training and accreditation for inspectorate and monitoring functions for the Scottish food industry.

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.

- Where there is an EU regulation, they should implement swiftly and monitor closely for 12 months, then report back to the EU Council, through the relevant ministerial presence, and assess the efficacy, relevance and practicality from a Scottish point of view and ask, if

necessary for any dispensations which fit particular Scottish characteristics. Where it is an EU directive or recommendation or opinion, then the field is wider for a Scottish solution, there is no point in re-inventing the wheel; assess the best practice from other countries' experiences and construct a robust and practical scheme for Scotland.

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 Soil Association and the Scottish Agricultural College should be charged with a research/monitoring function on the best ways to overcome the long term demineralization and erosion of Scotland arable farming land , and contribute to the development of higher mineral and nutritional quality of soil produce and animal feed, and find alternatives to heavily nitrogen-based fertilisers

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?

- Focus groups-sign up for a two year stint with as wide a variety of shoppers, chefs, housewives (or househusbands) and people who are the end users of the Scottish food chain.

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 would constitute a new Scottish FSA as a tripartite council- a directorate appointed by a free vote from 129 MSP's, which would include appointing the chair/convenor; A section appointed jointly by a cabinet committee comprising of the NHS minister, the Minister for Fisheries, Food and Agriculture and the First Minister, and a third section of lay experts drawn from a revolving panel of academics, industry experts and the food buying public- with Tesco points too.

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 I have been involved in the National Health Service in Scotland since 1979, as a user, supporter, relative, but mainly in my capacity as a student Nurse, then as a Registered Nurse, working a full time week for the duration.
- I have had the benefit of time and the privilege of watching the changes in society and how the health of our nation has unfolded as I have progressed through my career in the NHS in Scotland, and also through undertaking CPD and in-house learning modules and events.
- It occurred to me that progress does not always = improvement, and that the Health

of The Nation, individually and collectively has in some ways regressed. There are an increasing number of commentators, both academic and the more sensationalist, advising that there is an Obesity 'epidemic' on our doorstep and 'urgent' measures are needed to 'tackle' it.

- A reported increase in public money being spent on health promotion/health advice and treatments has, apparently, not translated into improvement in individuals' health, and often this leads to press and commentators describing Scotland as 'the sick man of Europe', a phrase which bears more than a little dispassionate investigation;
- A Scottish Government report from 2011 gave an estimated figure of £200 million between 2008-2011 being spent on tackling the obesity problem (1), which by their own admission did not have much effect on obesity levels;
- An article in The Herald in 2008 by Judith Duffy (2) reported on a survey and comparison of Scots' death rates and health issues compared with similar areas in Europe, and, again despite millions of pounds of public expenditure on health advice and promotion, things appear to be getting worse rather than better. ;
- A report from the House of Commons Health Committee in 2009 (3) showed evidence that money well spent on health promotion can have positive outcomes, though apparently not in Glasgow, a city they deliberately visited as part of their enquiry.

1. <http://www.scotland.gov.uk/Publications/2010/02/17140721/7> [20/12/2012]

2. <http://www.heraldscotland.com/what-makes-scotland-so-sick-1.828614> [20/12/2012]

3. <http://www.publications.parliament.uk/pa/cm200809/cmselect/cmhealth/286/286.pdf> [6/1/2013]

At the risk of repeating myself, again I say education about food, the processed food industry, farming methods, the action of food on health, etc., is the keystone the lynchpin, the fount of all happiness. In a secular social democracy, we value freedoms and rights, but we must abut these with duties and responsibilities. Information is the lock.. Education is the key. We can't force quorn and salad down people's throats.

In an increasingly stretched national health service, an ounce of prevention is worth a pound of cure and it is in every individual's interest to look after their own health.

These 3 references, very much picked at random, are a small insight into a huge defiantly scary insurmountable problem, but as they say, a journey of a thousand miles starts with one step.

I believe, if the ideas, creativity, and the combined experience and knowledge of the communities and organisations can be married to the political will of the nation, then we can begin to turn the ship around and, though it may take a generation, we have to believe in better health- for instance we need to take the positive health messages associated with the smoking ban and drive that message home to the remaining smokers. I look at our older people in the streets, in hospital clinics and GP waiting rooms, crippled with arthritis, obesity, COPD, cancer, and can't help thinking something is wrong, and by and large it is our diet that is wrong. We need to fix it.