

**BMA Scotland response:
Scottish Government consultation on creating a new food body
May 2013**

The BMA in Scotland welcomes the opportunity to respond to the Scottish Government consultation on the creation of a new food body. The BMA supports the dual role of Food Safety and Food Standards to be delivered by this new body and believes that this should be reflected in an alternative title for the new organisation: **“Scottish Food Safety and Standards Agency”**.

Food Safety

Recent public health risks, such as the substitution of horsemeat in food products emphasise the importance of having rigorous standards that food producers and retailers must adhere to as well as effective inspection processes. However as many producers operate outside of Scotland it would be important that the new Scottish body works closely with the bodies responsible for food safety and standards in the rest of the UK and EU.

Food Standards – Policy development and implementation

While efforts have been made to try to develop policies and frameworks to address the growing obesity problem in Scotland, these have been piecemeal and disappointingly ineffective. The role of a new food body should be to co-ordinate activity and provide leadership to deliver an effective health and nutrition policy.

As well as ensuring food standards are met, the BMA believes the role of the new body should include the development and implementation of policy. For example:

Labelling: The BMA is disappointed at the lack of progress on traffic light food labelling both at a UK and EU level and the BMA would welcome more concerted action on this issue by a new body.

Research: The BMA believes that the new body should champion evidence based practice and policies and undertake, fund and promote research in Scotland. However obesity is not a Scottish specific condition but instead research should be focused on interventions and policies that will have the greatest impact on reducing the burden.

Education: Health Scotland provides much of the public engagement/education programmes on healthy matters in Scotland but the new food body should have a partnership role in developing such programmes for example, providing the expertise and skills to develop parenting classes to give adults the skills to make nutritionally balanced meals.

Independence

The BMA welcomes the intention for this organisation to be independent of Government and the food industry. The BMA firmly believes that commercial industry should not have a role in the development of public health policy. There is a fundamental conflict of interest when industry is focused on making a profit and health professionals are attempting to improve the public health.

However as well as looking to develop policy and standards, the BMA believes that there is a growing need to consider the ‘obesogenic’ environment which greatly influences the choices people make.

For example, as well as ensuring that the legally required standards for school meals is met, the body should have a role in extending food standards to other public sector organisations e.g. hospitals and care homes.

The body should also consider how to limit the influence of the junk food industry and develop opportunities for the healthy choice to be the easy choice. For example, limiting the location of fast food outlets near schools, banning junk food advertising before the watershed and limiting the advertising of ‘unhealthy’ products in the health environment e.g. in hospitals, or at sporting events e.g. the 2014 Commonwealth Games.

**For more information contact
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