

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?

- There is a case to make for the new food body (NFB) extending its scope to include the wider public health agenda, as well as issues such as provenance and traceability. However, it is equally important to maintain a clear focus on food safety and hygiene and for the new body to work with Local authorities to provide the necessary support in these areas.

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. Given Scotland's poor record on diet, obesity and healthy eating requires a well coordinated approach to policy initiatives with other agencies in this area. Health promotion in schools is an example where local authorities would be well placed to deliver programmes with suitable resources, support and coordination from the NFB.

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 NFB could fulfil a co-ordinating role to ensure consistency across local authority and Community Health Partnership areas

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 new food body should maintain awareness of and build links with established scientific advisory committees, SFELC, as well as relevant academic research programmes in Scotland, UK, internationally (EU, WHO) and with professional bodies such as REHIS and SCOTTS.
- Guarantees should be built in to ensure that the NFB will have access to existing scientific advisory committees
- The NFB may also have a role to play in the delivery of scientific and public analyst services. We are aware that the Improvement Service is currently doing work to look at a shared services delivery approach.

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 NFB should have a focus on Scottish priorities e.g. specific communicable diseases with high prevalence in Scotland; dietary and alcohol issues. However, it should contribute to science and evidence programmes which have relevance to the UK as a whole as well as on issues particularly pertinent to Scottish citizens. There are a range of food related public health issues that are relevant across the UK where it makes sense to maintain a common approach. There will be research and emerging issues that arise from research work carried out in Scotland that will have relevance throughout the UK and vice versa. It is worth bearing in mind that the Scottish Government's policy on minimum pricing for alcohol was informed by research carried out at the University of Sheffield.

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. A coordinated approach should ensure any links and cross referencing of related issues are highlighted and avoid conflicts of interest in different policy areas. The new food body should raise awareness of its roles and responsibilities with research bodies across the UK.

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.

- As well as links with research bodies it is important that the new food body retains strong links with local authorities and their representative bodies, to ensure that feedback from the 'front line' is received and taken into account.

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.

- In light of the emergence of issues surrounding cross species contamination, consideration should be given to additional powers at a national level to allow for rapid intervention at the relevant part of the supply chain to prevent widespread distribution of non-compliant products. This is covered to a certain degree in the FSAS consultation paper proposed enabling Primary Food and Feed Legislation Provisions,

to which Renfrewshire Council has provided a response.

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.

- We agree that a robust regulatory regime with strong sanctions is required, particularly in circumstances where there is clear evidence of large scale deliberate fraudulent activity. The introduction of fixed penalty notices for some categories of both Food Hygiene and Food Standards contraventions should be considered, where appropriate, as an alternative to submission of reports to the Procurator Fiscal.

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.

- Our view is that a settling in period should be allowed once the NFB is established. Thereafter, it would be appropriate to review roles and responsibilities and make decisions based on experience built up in that period. However roles and responsibilities are distributed, a strong focus on partnership working should be established and maintained.
- It would be advantageous to both enforcing authorities and business to have only one enforcing authority to responsible for any given premises, so whoever has the greatest role would cover all aspects of Food and Feed official controls for these premises.

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.

- In general terms, in Scotland there is broad agreement that there are well established links and good levels of communication and co-operation between the FSA, SFELC and Local Authorities, to ensure that official controls are delivered effectively. This should be maintained and built upon by the NFB.
- In relation to the suggestions made in the consultation for suggested changes to delivery of controls, we would comment as follows;

Approval of food and feed establishments – Renfrewshire Council's view is that the proposals appear to ensure a consistent approach to the approval process. We agree that the delivery of official controls should remain with local authorities for establishment where they currently deliver these controls.

Food standards in Approved Premises– Renfrewshire Council agrees with the principle of one body being responsible for all official controls for a given premises.

Coordination of export certification –In practical terms it is our view that

service delivery remains with local authorities. Renfrewshire Council has well developed procedures for dealing with export certification matters relating to Glasgow Airport and large manufacturers such as whisky producers and approved meat and fish processors.

Import controls at ports of entry –As comment above re export certification.

Delivery of official controls relating to animal feed hygiene and standards – This is a small element of the work carried out by Renfrewshire Council and from our perspective we agree with this proposal.

Delivery of all official controls and related monitoring activity during primary production - This is a small element of the work carried out by Renfrewshire Council and from our perspective we agree with this proposal

Delivery of official controls relating to the supply and manufacture of materials and articles in contact with food, food additives and processing aids –Renfrewshire Council agrees with this proposal.

Recognition of natural mineral water sources –Renfrewshire Council agrees with this proposal.

Technical and professional training – Renfrewshire Council acknowledges that this could be a useful service that for local authorities to have readily available and would assist in ensuring consistency of 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 new food body should continue with the current system of audit for local authorities, which works well.

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 key relationships appear to have been identified.

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?

- The NFB should take a more proactive approach in order to ensure consumers are aware of its roles and responsibilities.

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.

- Agree. No further suggestions

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?

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