

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?

- **The IFST would support extending the scope of the new food body beyond the current scope of the Food Standards Agency in Scotland if its establishment is to meet the Scottish Minister's commitment to improving public health through the provision of safe food and an improved and healthy diet.**
- **The new food body should clarify which roles, responsibilities and areas it intends to lead on as the Central Competent Authority and which other Competent Authority or Agency it will defer leadership to and work in partnership with.**
- **IFST will support the new food body's involvement in wider national issues such as alcohol and obesity as long as strategic leadership was implemented and maintained in respect of core food law functions with the streamlining of existing workload burdens and demands together with the provision of sufficient resources to ensure that all enforcement operations can be fully achieved.**

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 (attached). If not, what changes would you suggest, and why?

- **IFST agrees the arrangements in Annex A should continue. The IFST also agrees that in establishing the new Food Body, clarity should be given on the lead role for diet and nutrition.**
- **IFST also support the new Food Body taking the lead in the areas outlined in paragraphs 34 (science and evidence based, consumer focused public nutrition policy) and 35 (policies such as the Healthy Living Award for caterers).**

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.

- **IFST is of the opinion that the areas suggested in the consultation document are the appropriate functions of the new Food Body**

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.

- **IFST recommends that the new Food Body maintains the independent advisory scientific committee network currently in place in the UK. This will avoid duplication of effort and recognise the integrated nature of the food supply chain in the UK**
- **IFST suggests that the new Food Body seeks to establish additional international support given the global nature of the food industry and the speed by which new developments are introduced.**

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.

- **IFST recommends that the new Food Body should deal with both areas, given that food businesses link into UK food supply chains and this is a significant part of the Scottish economy.**

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.

- **IFST supports the new Food Body being responsible for food safety research, but would suggest that the new Food Body works in partnership with NHS Scotland with respect to public health nutrition research.**
- **IFST would recommend using existing links to academic institutions and the international network for overseas research.**

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.

- **IFST recommends that the new Food Body maintains and strengthens the current working partnerships with the food enforcement community through the Scottish Food Enforcement Liaison Committee and Scottish local authorities through the Food Liaison Group network in respect of food safety, food standards**

and nutrition policy

- **IFST fully supports the continued use of the national UK FSS national sampling database in the recording of all survey and sampling data.**

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.

- **IFST supports any provision of additional statutory powers to the new food body in order for it to be satisfactorily equipped to deal with any and all food related incidents.**

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.

- **IFST would suggest that the new food body review and introduce a range of enforcement options to deal with food standards contraventions. At present the enforcement choices jump from the informal action of a warning letter to the submission of a report to the Procurator Fiscal recommending prosecution.**

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.

- **IFST agrees that the establishment of the new Food Body provides an opportunity to take stock of the roles and responsibilities of all organisations involved in food and food official controls and related areas**

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.

- **IFST supports the existing successful partnership approach in Scotland between the Food Standards Agency and the Scottish local authorities. This should progress forward with local authorities retaining their current responsibilities.**
- **The recent 'Protecting Consumers' report by Audit Scotland recognised the good work in this area in providing consistency and the new Food Body should seek to enhance these existing partnerships and not introduce significant changes to the current responsibilities shared between the FSA and local authorities.**

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.

- **IFST recommends that the new Food Body maintains the current working partnership with Scottish local authorities to develop a Scottish Framework Agreement similar to the one existing for the UK. It also recommends that the existing Food Safety Code of Practice and the Practice Guidance documents are replicated to detail official control delivery.**

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 existing partnership approach adopted by the Food Standards Agency in Scotland has worked very well and should be continued by the new food body.**

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?

- **IFST welcomes the consumer focus proposed for the new Food Body and would recommend engagement is via the existing networks.**

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.

- **IFST agrees with the approach to ensuring the new food body's independence from Government and the food industry.**

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?

- **No further comments to make**