

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 new food body (NFB) should not necessarily extend beyond the current scope but it should have a wider vision and awareness of the food system and social values around eating, including areas such as sustainability and food security, not least to avoid unintended consequences of any actions. This can be achieved through better collaboration with government departments, NHS agencies and NGOs active in these areas and a greater understanding of these additional areas within the NFB.

The NFB should engage with pressing public health nutrition issues such as food poverty/insecurity and caloric overconsumption, with supporting research to provide a good scientific evidence base of how best to tackle these problems.

Training of health professionals in nutrition should be considered, in collaboration with relevant professional bodies. The current work within the FSAS focuses mainly on the food industry and the consumer and could be extended to include the influence of retailers and their role in the public's food choices.

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?

The work of NFB should be independent of Scottish Government in formulating advice, commissioning research and evaluating Government policy. Greater partnership between SG departments, NHS and relevant NGOs is needed with the NFB: the NFB should play a central role in linking the nutrition and food related activities of the different bodies. The NFB should work in close partnership with the Scottish Government but be in a position to act independently of any political will and make evidence based decisions for the benefit of public health, even if these are potentially politically unpopular decisions.

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 should have a wider vision of the food system to include climate change, food security, food poverty and social values around food and work synergistically with agencies focussing on these issues. The NFB should also lead on evaluation of food-related policies and legislation, (e.g. the new Publicly Available Specification for marketing of food). The NFB should make links across the whole food system to include food industry, retailers and consumers.

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.

There are well established and internationally respected food advisory bodies in the UK, such as SACN, which have representation from scientists based in Scotland and these should form the basis of evidence underpinning food safety and public health nutrition. The NFB would not benefit from establishing new advisory committees based in Scotland as the number of suitably qualified advisors is too small. It would also be uneconomic and would not make sense to duplicate these well established committees.

The advice for nutrition and health in Scotland is unlikely to differ from the rest of the UK, however within the NFB there may be a need consider ways to tackle poor diet related health within the social and environmental context in Scotland.

The NFB would benefit from the appointment of a Chief Scientist to be responsible for the quality of the science commissioned and evidence being used by the NFB.

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.

In a global food system many of the major nutrition and health issues are common to all countries; question which are particularly relevant to Scotland compared to the rest of the UK (e.g. selenium or Vitamin D deficiency) also occur in other countries, and there is much that could be learnt from other countries. Surveillance and evaluation should however be focussed on Scotland, with a particular emphasis on vulnerable groups, notably young adults, families and older people dependent on income support. The NFB should contribute to science on wider issues which have relevance to the UK as a whole.

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.

We believe that the NFB should not be responsible for the coordination of all of the Scottish Government funded research in food safety and public health nutrition. There is a risk that with the current scope of the NFB the research agenda might become too narrow. If the NFB was responsible for coordinating all Scottish Government research it would require more experienced staff with significant expertise in food and nutrition research to identify suitable research questions and commission and monitor projects. Research commissioned by the NFB should be subject to peer review and follow ethical standards set by for example the CSO. An advisory group, containing expertise in a wide range of biological and social science disciplines could be established with a chair and a majority of members from outside Scotland (as e.g. the Health Review Board in Ireland) to avoid conflict of interest.

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.

The evidence base generated by EFSA and SACN should provide robust evidence for Scotland, except on specific Scottish issues on which systematic reviews, surveys and qualitative work should be commissioned. For the latter a distinction should be made between market research and more in-depth qualitative research and other more open-ended forms of investigation.

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 NFB will require the power to investigate food related incidents promptly, publicly and independently. Identifying those responsible is necessary to act as a deterrent as commercial pressures driving these incidents will always exist.

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.

No comments

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.

The NFB should have a more active role in the independent evaluation of policy and legislation relating to nutrition/food and public health.

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.

No comments

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.

No comments

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.

See Q1 & Q2

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?

There is a need for more interactive and qualitative research evidence about the interpretation of information and advice provided by the agency, as well as real evidence about barriers to changing eating patterns from different sectors of the populations. There is a lot of anecdotal evidence about the barriers (e.g. lack of cooking skills and access to affordable healthy food), but these are not necessarily based on scientific research evidence, which questions whether these are really the main barriers to healthy eating. In terms of public health nutrition there also needs to be a greater understanding and recognition of the social value of food and its role in terms of well-being, not just physiological health. This is particularly important in terms of food insecurity and dietary advice to different groups within the population, the concept of 'long, healthy lives' may not be sufficient to inspire people to change their dietary habits. This is an important issue as dietary intakes are not improving, therefore there needs to be a better understanding of how to engage consumers.

There is a need for the NFB to change the language used in its discourse with members of the Scottish public, about the public's health, and the role of nutrition and our food system plays (or could play) in improving the nation's health. The term 'consumer' has a number of negative connotations that may (in itself) be a very potent barrier to engaging more effectively with the public. Working with and through frontline community groups and organisations may enable the NFB gain a 'wider reach' within all sections of Scottish society, for the purposes of gaining more informative insights and understanding of the meaning and place of food (and its link with health) in people's lives day-to-day.

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.

The NFB will need to be given the powers that enable it to act based on good scientific evidence and independently of political will.

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