

## 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?

- NHS Lothian welcomes the recognition that improving diet has the potential for improvement in public health similar to tackling smoking and excess alcohol intake.
- The proposal for stronger leadership on nutrition and related issues is also welcomed.
- Co-ordination of messages around nutrition in Scotland is important too.
- Whether or not the new food body extends beyond the current scope of the FSA, it would be beneficial to have greater clarity over the role of different organisations in providing nutrition-related information to the public and practitioners.
- One option would be for the new food body to act as a central information resource, co-ordinating the dissemination of research and public-facing resources on food and health.
- Through its role in advising caterers and retailers on food safety, there may be an opportunity to integrate advice on the formulation and promotion of healthier products, including understanding the new EU regulations on the provision of food information to consumers.
- In relation to its role in engaging with the food industry to promote product reformulation, there may be additional ways in which it can influence the whole supply chain to help tackle public health issues around, e.g. healthy food affordability, alcohol and obesity.
- The issues around nutrition relating to public knowledge, skills and attitudes are complex and multi-factorial and the new food body will need to take cognisance of this
- Linkages and relationships within and beyond Government Departments is also a consideration
- Clarity of roles and leadership areas will be crucial in moving forward
- Public trust in the new food body will be of vital importance.

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 current partnership arrangements between the Scottish Government, the new food body and NHS Health Scotland should continue, provided that each has very clear roles and that NHS Boards and the public are aware of which body leads on specific areas of work.
- It would be beneficial for one agency to take the lead in co-ordinating

research and messaging, in particular ensuring that reducing health inequalities are consistently addressed and that the information communicated is evidence-based.

- The independence of the FSA and transparency it has brought to the work in Scotland has been valued and must be retained.

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.

- At present, the majority of research undertaken by the FSA is food safety-focused. If the new food body is to play a key role in improving population health, it is important that more focus is placed on researching interventions that improve food choice. For example, through providing expertise in evaluating pilot initiatives (making links between academics and practitioners), and collating and disseminating evidence on projects that have been successful in changing eating behaviour.
- If the new food body takes on a co-ordinating role in relation to nutrition information, this could also extend to looking at the quality of information provided by the wide range of other organisations that promote food and health messages to the public.
- Through its work across the food supply chain, there is also the opportunity to expand the evidence base in relation to interventions that promote both public health and environmental sustainability.
- If the new food body is to widen the scope of work, it would be beneficial to consider where and how the healthy living award and Community Food and Health Scotland fit in that structure

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 continue to work closely with the full range of existing advisory committees and build strong relationships with food bodies in other countries to share evidence.
- Economies of scale of work and duplication of Scottish only groups when the issues are UK wide would also need addressed
- The process used to commission research and to recruit experts should continue to be transparent.
- At the consultation event, there was some concern over cuts in sampling at local level due to the fact that budgets aren't ring-fenced. This could potentially be tackled through either providing the new food body with a centralised budget or the power to set more stringent food safety testing requirements.

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.

- Given that the food industry is global, it is important that the new food body takes an international perspective. However, there is a clear need to focus on issues that are specific to the Scottish population, particularly looking at what interventions are effective for changing eating behaviour. Scotland's diet and issues related to poor diet and nutrition need to be considered in the wider health inequalities context.

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.

- This could be a useful way to ensure that research across the food chain is focused on improving public health and tackling inequalities.
- Having one body responsible for co-ordinating research may also improve the dissemination of research to those responsible for how resources are used at local level.
- The profile could be raised by strengthening links with academia, in Scotland and beyond.
- Linkages with Health Boards and Local Authorities can also be strengthened – to ensure local research development is relevant and complementary to nationally and EU driven work.

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 transparency and openness with the FSA has striven for needs to be built upon. There are many competing interests in health, nutrition and diet and an independent voice is necessary without competing interests. To build public trust and confidence of the organisation is crucial to helping engender and maintain the changes required both within the food industry and family.

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.

Difficult to comment here as not a full understanding of all the legislative powers. However, in the example given, food fraud does need to have

consequences. How these might be developed is beyond this consultation.

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 comment

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.

- If new roles and responsibilities are to be taken on, care must be taken to ensure that relationships, trust, and scope of work required does not suffer and will be enhanced with any proposed changes.

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.

- Not able to comment

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.

- Not able to comment

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 proposal that a wider public health role is taken to improving diet, nutrition and health would mean fuller engagement with NHS Boards, both national and territorial.

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 new food body could link more closely with registered nutritionists working at a local level, for example through NHS Boards and their partner organisations / networks, to consult with consumers on a range of issues.
- Partnership working with territorial Health Boards and Local Authorities would assist in effective engagement with consumers, local staff and agencies – including the third sector.
- Using methods such as social media to seek feedback from consumers

may be effective, but steps should be taken to ensure that the views of the population as a whole are represented.

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.

- Yes.

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?

- We appreciate this opportunity to be consulted