

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 body should reflect the aspirations of the National Food and Drink policy and seek routes to assist in the growth and innovative capacity of the sector.
- Further growth in scope would depend on the efficiencies envisaged.
- FSAS enjoys a high reputation with consumers and industry and should be cautious about diluting core focus.

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?

- Broadly, yes. The split of functions is reasonable.
- However, there may be operational efficiencies through simplification of what appears to be a complex set of relationships.
- It is difficult to determine at present which agency is the lead partner. Clarification of this would be helpful.
- Diet and Nutrition policy is a highly political area with positive outcomes that are difficult to achieve. Responsibility for the broad policy framework on public nutritional policy should remain with the Scottish Government. The consultation document sets out (clause 34) the role of the new body in public nutrition policy. This seems reasonable.

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.

- Adoption of the activities set out in clause 35 seems reasonable.

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.

- Comments

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.

- There are cost efficiency benefits through the sharing of research activity with partners elsewhere in the UK.
- Issues are likely to be broadly similar across UK.
- Clearly as a body funded by Scottish taxpayers the new body will wish to fully address those issues that are most relevant to Scotland.

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 would appear to be a reasonable extension of the FSAS current activities.
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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.

- Comments

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.

- Current statutory powers seem adequate. Issue related to communication, reporting and surveillance which do not require further legislation to address.

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.

- It is industry's interest to see a robust regulatory enforcement strategy adopted by the new body as set out in the consultation document.

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.

- It may be sensible to allow the new body to bed down before looking at new roles and responsibilities.
- Are there deficiencies in the way the activities set out in clause 44 are being currently carried out or are there any operational efficiencies.

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.

- There appears to be little merit in formalising through legislation the work of the SFELC. A voluntary approach is preferred.
- The changes envisaged in clause 48 are resource intensive. Will the new body be funded adequately to carry out such roles?
- Are there perceived to be deficiencies in the way the local authorities are currently carrying out this work? Are there significant operational efficiencies in moving the work to the new body?
- On farm inspections could be rationalised and simplified through the new body.

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.

- 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.

- Industry quality assurance/assessment schemes Red Tractor/AFS
- Consultation with stakeholder industry associations to maintain understanding of industry issues, technologies and innovations.
- Direct engagement with International stakeholders
- FSA, London Dept of Health. The fact that the new body will no longer be an integral part of FSA, with all the rights of engagement at Board level that entailed, is a major drawback. Contracts etc are a poor substitute for the right to a seat at the table. Establishing good communication lines at political and official levels will be key.
- The new body should be aware of the costs to industry of different policies being adopted in Scotland from the rest of the UK. Consistency of approach where possible should be sought. This requires effective industry stakeholder and inter-organisational communication.

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?

- Comments

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 this appears to be a sensible approach.
- Funding is an Achilles heel in relation to prevention of political control. Parliamentary committees will require to be vigilant in this area.

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?

- Should allow industry access to Board, advisory committees etc to ensure good communication and mutual confidence.