

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?

Yes.

The cost to the NHS (in the UK) of poor diet has recently been estimatedⁱ at £5.8 billion, more than the NHS costs attributable to inactivity (£0.9 billion), smoking (£3.3 billion), alcohol (£3.3 billion), and overweight and obesity (£5.1 billion), while contributing to other diet related risk factors for heart and circulatory disease including hypertension and raised cholesterolⁱⁱ.

Analysisⁱⁱⁱ of the impacts of a less healthy diet in Scotland compared to England concluded that improving the average diet in Scotland (as in Wales and Northern Ireland) to a level already achieved in England could have a substantial impact on reducing geographical variations in chronic disease mortality rates in the UK.

An independent Food Standards Agency Scotland would be well placed to take on these kinds of public health challenges. These factors reiterate the importance of the new FSA Scotland ensuring that diet related ill health is the top priority in its work programme.

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?

We agree with the view that a new independent FSA Scotland could provide clarity as to which bodies in Scotland are responsible for nutrition policy in Scotland.

It should also seek to build on the opportunities presented by partnership working, such as building links with Healthy Living Awards and third sector organisations with an interest in relevant areas, such as British Heart Foundation Scotland.

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.

An independent Food Standards Agency for Scotland could drive a broad range of initiatives, aimed at improving the diet of the population and thereby reducing CVD rates, such as

- Monitor and promote achievement of Scottish dietary targets – particularly salt, sugar, saturated fat and trans fats across all the population and within particular population groups- and, where necessary, support and inform legislative action. BHF Scotland sees this as a crucial area of work for the new FSA Scotland. Dietary targets must be set with a clear timetable and with adequate monitoring capacity in place. It is also essential that Ministers make it clear that, if the food industry fails to meet these targets, they will take specific legislative action to make reformulation of unhealthy products a reality.
- Research into new ways to sell positive nutrition messages building on social marketing approaches and into identifying and overcoming the barriers to healthy food choices – such as affordability, availability, aptitude, and attitude.
- Researching the consumption of unhealthy food products within specific population groups to ensure that Government policy meets the needs of all sections of the population, and provide recommendations to the Government on policy issues within its remit.
- Monitor and promote best practice in marketing by the food industry of unhealthy food products
- Help vulnerable people and those on the lowest incomes access affordable healthy food, and lead the fight against food poverty
- Advise people about the importance of safe food and good nutrition
- Support businesses in leading change to reformulate healthier products
- Support and promote healthy catering
- Encourage and support people to make healthier food choices
- Maximise opportunities to promote the role of food in our health when planning for major events such as Glasgow 2014
- Monitoring and promoting use of best practice in food labelling via hybrid front of pack 'traffic light' scheme

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.

Linking with U.K and European bodies with similar remits to the new FSA Scotland, such as the European Food Safety Authority, could be a valuable source of information and evidence for its work.

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.

As a UK wide organisation, it is our view that the new FSA Scotland could, and should, seek to contribute to science and evidence based programmes and policy across the UK. While its primary focus should of course be on its impacts in Scotland, there will inevitably be areas where its expertise could be beneficial on UK wide issues. The current devolution settlement means that some areas of policy that are relevant in terms of food policy (such as broadcasting) remain reserved to the UK Government. It seems sensible, therefore, to seek ways for FSA Scotland's work to inform policymaking in areas such as these.

The BHF will continue to lobby the UK and European Parliaments on a range of health related issues within their respective jurisdictions and would see an independent Food Standards Agency Scotland playing an important role in supporting and informing our campaigning work in these areas.

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.

It seems sensible for FSA Scotland to coordinate all Government research on areas within its remit, for clarity.

To raise its profile, the new body could consider the development of an award scheme or competition specifically to draw attention to its role in this area.

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.

We believe that the third sector could offer valuable practical insight into how this evidence base could be established.

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.

No view.

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 view.

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.

No view.

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 view.

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 view.

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.

Building relationships with third sector organisations, such as BHF Scotland, involved in public health policy and campaigning on other areas within its remit could be a useful link for the new FSA Scotland to make.

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?

No view.

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.

We share the view expressed in the consultation that it is essential that the new FSA Scotland is independent of both Government and the food industry.

The proposed governance arrangements (i.e. accountability to Parliament rather than Government) seem sensible to ensure the former and ensure

continuity of policy and research.

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?

BHF feels it is worth reiterating our view that we see the key challenge for FSA Scotland will be tackling the burden of obesity. While we agree that food safety is an important area for the new organisation, it remains our view that obesity and other diet related ill-health should remain a key priority for the organisation.

ⁱ The economic burden of ill health due to diet, physical inactivity, smoking, alcohol and obesity in the UK: an update to 2006–07 NHS costs *J Public Health* (2011) doi: 10.1093/pubmed/fdr033 First published online: May 11, 2011

ⁱⁱ Coronary Heart Disease Statistics 2012. British Heart Foundation.

ⁱⁱⁱ Differences in coronary heart disease, stroke and cancer mortality rates between England, Wales, Scotland and Northern Ireland: the role of diet and nutrition. Scarborough et al. *BMJ Open* 2011;1:e000263 doi:10.1136/bmjopen-2011-000263