

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 ASO support the suggestion that the new food body could widen its scope to encompass public health generally. However, duplication with the work of the Scottish Government should be avoided. Given the low impact of obesity interventions in Scotland to reduce obesity across the life-course thus far, more evidence based nationally run public health schemes to tackle problems such as obesity are justified. Challenging obesity is complex and requires a broad range of interlinked interventions to maximise impact. The enhancement of consumer information such as advising on health claims in food advertisements would support and potentially be part of any obesity interventions. The new food body should co-ordinate national approaches, harness independent experts in the field, and prevent the development of fragmented interventions, which differ across the country and are cost inefficient.

The ASO would appreciate clarity about where obesity fits – is it with the new food body or with health, or can the public health versus more clinical aspects be separated between them both two. Obesity issues are far wider than food alone and to this end ASO would appreciate clear definition about roles and responsibilities and arrangements for joint working on obesity issues in Scotland.

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 ASO supports the continuation of the arrangements for independent and partnership work on diet and nutrition. However care should be taken to avoid duplication of work.

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 ASO support the new food body taking on the additional role of directing and co-ordinating national public health schemes to challenge obesity. These responsibilities could include the monitoring of school meals in line with the standards “the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations 2008”. Although obesity impacts across the lifecycle, one important area of intervention that might be considered is during the pre-conception period and between pregnancy periods. This has

a potential to break the intergenerational cycle of obesity via developmental impact on the offspring.

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 ASO support the provision of steering groups, comprised of independent experts to underpin and guide the work of the new food body. These groups should be specific to particular work areas, and expertise should be sourced from specialist organisations such as ASO, or from experts from academia and in some cases the food industry.

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.

The ASO agree that there is ongoing surveillance in other countries in the UK and that the Scottish food body should focus their surveillance efforts on the Scottish population. There is a strong contingent of obesity researchers in Scotland who contribute internationally to science and evidence programmes and could interact with the new food body.

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.

The ASO agree that research for the Scottish Government and new food body should be co-ordinated to prevent duplication and ensure best use of research funding. It is unclear whether there would be sufficient resource to manage what could be a considerable burden within the new food body. The ASO suggest research should be managed through the Scottish Government, where resources to facilitate this are already in place, e.g. the Chief Scientist Office. This would ensure clear justification of any research on public health nutrition and obesity and maximise transparency.

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.

No response.

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 response.

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 response.

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.

Additional role in the development and co-ordination of public health initiatives, particularly with respect to obesity across the life course (Q1).

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 response.

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 response.

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.

No.

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 ASO consider, that provision of diet and health resources to support and facilitate dietary/weight change, should be in a form most accessible to those of low SES. UK Government evidence suggests that engaging this group is not best achieved using on-line resources.

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 ASO agree with approach in place to ensure independence. We have no further suggestions.

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.