

## 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 National Services Scotland provides a range of support services to NHS Scotland including a national strategic procurement service, development of the NHS Catering and Nutritional specification, as part of the Food, Fluid and Nutritional programme and the protection of the public from infectious and environmental hazards through the activities of Health Protection Scotland. Our responses are based on the expertise and experience within these services.

Yes

- We suggest that, within the wider context of public sector reform, the establish of a new body present an unique opportunity for tackling health inequalities. The role of the new body should have a public health focus particularly in relation to vulnerable groups in Scotland including young people, the elderly and the socially disadvantaged. For example, if Scotland is to reduce obesity and health problems caused by nutritional related issues we have to target the young population of Scotland at the earliest age possible and introduce specific nutritional/dietary learning in schools.
- It should be involved in the quality and nutritional standards of meals provided in schools, hospitals, care homes etc., especially for services provided by third parties.
- Its role should also include food labelling, provenance, security and sustainability which is not clearly defined at present by any national body. There also might be a role for the new food body to support local procurement; investigation has shown that the main reason for the lack of tender submission from local suppliers is that they do not have the knowledge to provide a tender response and, in some cases, the capacity to supply. If the new body supported cooperatives of local suppliers to work together to provide tender responses it could drive up supplier capacity and capability.
- The new food body should also be responsible for full national policy and direction on traceability and authenticity including testing, audit records, compliance, database etc.

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?

Yes

We suggested that it is appropriate for the new food body to implement Scottish Government policies aimed at addressing health inequalities at a community level. The new body must be able to set and measure nutritional standards and take action where policies/standards are being ignored or poorly interpreted.

Where currently in place, we believe that these arrangements should be continued however should be clearer and easier to understand by the general public and industry in general. It also should cover the full spectrum of nutrients.

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.

Yes

We suggest that the new body must work across the public health sector to develop and implement dietary and nutritional knowledge (healthy eating) through schools, suppliers, care homes, NHS etc and they must have the power to enforce where necessary; without enforcement there will be little or no impact on the standards of health in Scotland.

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.

This could be done through the involvement of experts in the relevant institutes in Scotland and across the UK and by ensuring that such experts are involved in the development and production of policy and standard setting. The NHS Catering and Nutritional specification, as part of the Food, Fluid and Nutritional programme, was developed by a wide group of experts and included specialist leads from a wide variety of backgrounds. This document is now seen as 'the model' to follow across the four nations.

We believe that the new body must work in close partnership with the Environmental Health Agency which currently does not appear to be the case.

In our view, in the area of food safety, it is vital that the new food body maintains and develops its links with relevant bodies, in particular NHS National Services Scotland Division, Health Protection Scotland (HPS). Links between FSA(S) and HPS are currently good and, while informal liaison should continue, consideration should be given to more formal links between the two organisations. This is to ensure that HPS's activities, for example its surveillance output, is closely allied to the new food body's needs, for example evaluating the effectiveness of its foodborne disease strategy.

In the area of public health nutrition, we suggest that it would be advantageous if the new food body sharing its priorities with other key stakeholders in line with the Christie report recommendations.

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.

We believe that the two options suggested are not mutually exclusive.

We recommend that the new body focuses on the citizens of Scotland and Scottish specific issues because these are less likely to be addressed by other but not ignore what is happening in the wider UK and Europe as these affect Scotland too.

Scotland already has a good reputation for leading on food, fluid and nutrition and it would be appropriate to continue to share and welcome improvements across the UK and Europe.

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.

Yes.

We believe that, as the body responsible for food safety and public health nutrition, the new food body, in close collaboration with Scottish Government, and HPS in relation to food safety, should be the body responsible for setting research priorities and pursuing an appropriate research strategy. It should be able to call upon external research as required to ensure a thorough and rounded research base.

The current body has a relatively low profile and does not appear to take a leading position in the matters relevant. Launching the new food body to the citizens of Scotland and across the UK and engaging, through involvement in national and local conferences, with academic institutions and community and welfare organisations would its profile.

There is research already available that provides evidence of the various age groups and their personal nutritional habits.

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.

A considerable amount of research work has already been undertaken across food safety, standards and nutrition would provide a solid base on which to build. The specialist bodies and organisations we have available within Scotland, have already provided considerable support to many organisations for the improvement of food, fluid and nutrition across Scotland.

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 recent horse meat concerns illustrate weaknesses in approach in that instead of the current body taking a leading stance, including responsibility for coordinating and managing the response nation wide, this was left to each public and private sector body to manage on an individual basis with some Scottish Government coordinated approach being taken.

If a central body had been leading the approach it would have ensured it was coordinated across all the sectors, both public and private, and the food standards and safety bodies including relevant independent experts where required.

Any statutory powers will require the full support of the laws of Scotland and their being used to their full extent. It is clear that those who break the laws governing food stuffs do so with complete disregard for the safety of the public. If they were dealt with in a considered and measured way it would act as a deterrent. Regular inspection and testing by the appropriate body with results provided to the new food body would also be supportive.

It would be useful to extend the existing powers of authorised officers to detain food considered safe but where there are doubts over either its

composition, description or labelling.

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.

We recommend that the new food body:

- Has both the authority and responsibility for leading, managing and enforcing ongoing quality standards and take a lead role for public bodies when responding to crisis such as the recent horse meat issues.
- Works with other food agencies such as environmental health and health and safety in enforcing the law.
- Communicates regularly across all bodies and making sure the message to the public on food safety is always a high priority.
- Introduces a contact number where the public are able to report their concerns.

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.

Yes.

We recommend that the new food body has responsibility for ensuring sufficient capability to undertake the investigation of foodborne disease outbreaks occurring in Scotland. This would include ensuring a comprehensive public analyst service is available to support the investigative work directed by the Problem Assessment Group/Incident Management Team.

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.

Stronger communication and stronger partnership working would allow teams from different bodies to work as one when necessary to reduce food crime and improve food, fluid and nutrition.

All too often agencies work independently and miss the unique opportunities of building specialist teams across organisations to tackle and target specific situations; it would be regrettable to miss such opportunities in the future.

Taking a nationwide approach rather than only working with local authorities

avoid the weaknesses previously highlighted in the current regime. The current body is only in an advisory position rather than having the responsibility and authority to deliver compliance and the real change that is necessary.

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.

As previously commented, the new body will require to have the necessary responsibility and authority to deliver compliance.

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.

In general there is a current issue with education of the population in terms of general diet and nutrition and ongoing daily management of diet and nutritional content of food. We suggest:

- Establishing stronger relationships with food producers and suppliers, and regular communication on government and food body expectations.
- Developing a full education programme for the younger generation building knowledge for long term action and improvement.
- Utilising technology to deliver easy checking systems and processes, for example using smart phones and phone applications to scan food against a daily nutritional requirement.

In relation to food safety we suggest that the new food body should strive to liaise even more effectively with relevant partners especially HPS as described in the answer to question 4.

In relation to public health nutrition we suggest that the new food body should strive to liaise even more effectively with relevant partners especially Local Authorities in ensuring shared priorities and single outcome agreements in line with the recommendations of the Christie Report.

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?

We suggest:

- Reviewing the current national curriculum to ensure children are being educated in all matters relating to health and nutrition.
- Developing ongoing educational campaigns via channels such as media, internet, mobile applications, NHS etc.

- Producing information that is readily available and easy to understand.
- Introducing clearer information and food labelling in supermarkets/shops.
- Communicating better through bodies as previously discussed and reaching vulnerable groups including young people, the elderly and the socially disadvantaged through community action.
- Providing information events in community centres etc, showing how to buy and cook affordable healthier meals.
- Engaging even more closely with the social sciences to ensure that its campaigns not only raise awareness and improve the public's knowledge of food safety and nutritional issues, but also influence attitudes and so modify behaviours.
- Developing campaigns directed at specific target groups, for example the elderly or single parents.

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 we agree that it must be independent and transparent.

We suggest that the head of the organisation requires the necessary authority and remit to do the job effectively and be supported by a management team with the right knowledge, industry experience and attitude. This will assist the new body to establish the right positioning between itself and government and will build confidence and credibility with the public and the industry in Scotland.

One possible option would be incorporating the functions into NHS National Services Scotland. We already provide a range of services, many of which currently interact with the Food Standards Agency. We have established credible services at arms length from government through the Public Services Reform Order and are able to support all public sector bodies. We have strong governance already in place which enable the avoidance of incremental cost both in terms of set up and Board administration.

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 further comments.