

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?

We strongly support the Scottish Government's recognition that improving diet offers similar potential to improve public health as, efforts to tackle smoking and alcohol, and that this will be supported by legislation to create a new food body.

We would welcome stronger leadership on nutrition and the coordination of messaging in Scotland by a new food body as currently there is a fragmented approach to this.

It would be beneficial for nutrition to be formally identified as a priority and for the new food body to focus on the obesity epidemic and in particular the implementation and monitoring of the Obesity Route Map and surveillance of obesity. In particular it would be useful if the new food body could be responsible for the science and evidence gathering to inform policy and standards, commission research, assess existing nutrition evidence/practice in this area and have a proactive role in guiding public opinion and emerging public health thinking on obesity.

The new food body should have health equity as a fundamental principle and ensure that all work is underpinned by aiming to reduce the health inequalities that are present within food and nutrition across Scotland.

There are many national organisations across Scotland that currently have a nutrition portfolio. The extent to how effective each are in improving nutrition within their area of work is unknown and for some organisations is questionable. This lack of effectiveness seen in some organisations is due to a variety of factors one of which is that nutrition competes with other priorities such as smoking and sexual health but constantly loses out. Could the new food body compliment the work portfolios of the other national organisations? Or could the nutrition portfolios of the national organisations move to the new food body? A review of the effectiveness of the national organisations in prioritising nutrition and meeting food and nutrition outcomes should be undertaken. If the decision is to ensure that the nutrition portfolios remained within the national organisations then the new food body could be directed to monitor and ensure that these organisations meet their nutrition priorities and outcomes. It is vital that relationships between all national organisations are maintained.

Public knowledge, attitudes and skills around nutrition are complex and the new food body would need to align with work in these important policy areas and ensure that all organisations eg Scottish Government/Local Government Education Departments are working towards improving the public's knowledge, attitudes and skills around appropriate nutrition throughout the life course.

It is vital that the new food body is independent and is seen as being independent from the food industry and working towards improving the nutritional health of the nation. It requires to be trusted by members of the public and must ensure that consistent messages are

provided and that these messages are based on scientific evidence.

Overall, the scope of the new food body should extend beyond the current scope of FSAS. How far this scope extends requires debate with all key stakeholders. It was felt that the scope within the current new food body document was narrow and could be made wider.

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, although it is vital that the new food body is independent and is seen as being independent by members of the public while still working in partnership with other organisations.

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 new food body should have additional roles however these require to be agreed after the current nutrition roles, responsibilities and effectiveness of other national organisations are identified.

Ensuring the Obesity Route Map is delivered should be an additional role and a priority for the new food body.

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.

As above, to ensure a holistic approach, organisations engaged in work in this area need to be working closely together and to ensure engagement of the wide spectrum of key expert bodies and stakeholders to include: The British Dietetic Association, Universities, Scientific Advisory Committees. It will be important to identify resources/people who would be in a position to advise.

The new food body needs to be able to access expertise beyond Scotland. It is neither practical nor possible to be able to address all areas of nutrition across the life course without access to a wider spectrum of nutrition intelligence from across the UK (or even beyond).

Recognition of the dearth of practical nutrition expertise that exists at the coal face also needs to be recognised.

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.

It is critical that the research and surveillance is pertinent to Scottish citizens but that may mean that activities may occur beyond Scotland if the work requires a bigger sample for example, if the learning is generalisable, or if there is an opportunity to work in partnership with other agencies across the UK or internationally.

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.

A joined up approach would help to ensure that research is focused and duplication is limited. Equally, a portal which helps people identify common areas of research which are underway could also be beneficial.

A lot of public health nutrition however, crosses the boundaries of health, social care and other areas. Responsibility for this may be possible within a new FSA but there is some concern regarding this within an FSA as it currently stands with the focus largely on nutrition guidance.

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 establishment of an evidence base requires the development of an explicit and transparent methodology and participation by representatives of key groups and disciplines e.g. Scientific Advisory Committees, Universities, Professional Bodies etc

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 comment

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.

There is some concern regarding the new body taking on roles currently carried out by other organisations. Scotland is a relatively small country with limited resources and expertise therefore it is essential that the role, remit & responsibilities of different organisations in relation to the nutrition agenda are absolutely explicit and understood. A needs assessment and stock take would provide an opportunity to identify gaps if they exist.

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 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.

No 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 Food Body needs to be developing links across the full range of expertise and organisations involved in food and nutrition to include territorial boards, Universities, Third

Sector etc.

It needs to establish links across the departments and organisations of the Scottish Government to include health, social care, education, environment etc recognising the breadth of areas that public health nutrition covers and the important role it has in all of these areas.

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?

It needs to have explicit communication and, informing, engaging & consultation plans that employ a wide range of techniques that are appropriate for the designated target audiences including social media and face to face.

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. It is of vital importance that the new food body is viewed by the public as an organisation to trust and therefore be provided with clear and consistent evidence based messages. It would be of vital importance for the organisation to have autonomy to act on scientific evidence independently from the political environment.

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?

The new food body should have a lead role in driving a public health nutrition strategy for Scotland and presented a joined-up view of policy to improve food, nutrition and health so that professionals and the public alike are clear about the direction of travel including the approach to obesity prevention and management, achievement of Scottish dietary targets, food poverty and inequalities, and food and environmental sustainability.

The new food body requires an overview of all aspects of food and nutrition especially with the current policy framework sitting under different divisions within Scottish Government.