

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 scope of New Food Body (NFB) should be extended beyond that currently to encompass general public health such as alcohol and obesity specifically and those specified in paragraph 20.

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 the arrangements should continue and be expanded upon to link better into Community Planning. Making full use of existing resources from LA's, NHS and the NFB will be critical for the delivery of Scottish diet and nutrition objectives at a time when resources are continuing to be cut from the public sector..

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 roles and responsibilities specified are the appropriate functions for the NFB.

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 NFB should engage with all stakeholders in the scientific, health and regulatory communities to ensure the best available expert advice is obtained.

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 NFB will require to deal with both Scottish and National issues and therefore research and surveillance activities will be required at both levels.

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 the NFB should be responsible for the coordination of all research in these areas to ensure efficient use of resources. Strengthening of existing links with academic institutions and funders will help raise the profile of the NFB as a research funder.

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 strong evidence base on which to base policy could be obtained through closer working with Local Authorities in the design and implementation of coordinated sampling programmes. The use of the national database UKFSS for this work would ensure the consistency and quality of the information obtained.

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 power to transfer enforcement responsibility during incidents of national concern may be useful in dealing with food/feed emergencies. The ability to issue transferable authorisations for other local authority work may be of benefit to ensure adequate resources are available to deliver controls.

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.

- There is a lack of enforcement options to deal effectively with Food Standards. Similar provision to that for Food Safety offences requires to be made. A specialist fiscal unit within the COPFS, similar to that for health and safety, should be considered to ensure consistent enforcement and raise compliance levels throughout Scotland.

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. The NFB should consider rationalising existing controls to remove dual enforcement for hygiene and standards at any one business. Responsibility for the approval of establishments and any subsequent suspension or withdrawal of that approval under EC No 853/2004 should also be adopted.

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. The existing partnership between the Food Standards Agency and Local Authorities works well and this approach should be adopted by the NFB.

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.

- The NFB should assure the delivery of official controls through the development of service level agreements with Local Authorities. The provision of a trained and competent inspectorate involved in the delivery of official controls should also form part of this agreement.

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 existing partnership approach works well and should be expanded upon to meet these objectives.

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?

- Current engagement is effective. The provision of information could be expanded upon with the introduction of mandatory display of FHIS certificates.

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.

- I agree with the suggested approach.

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.