

## 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?

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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

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.

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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.

- Ensure that there are appropriate agreements and links in place with relevant agencies both within and without the UK.

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.

- Both as placing undue restrictions on activities could hamper the ability to react to arising issues. Most issues are not limited by geography, however there should also be scope for more localised activities where necessary.

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.

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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.

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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.

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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.

- by ensuring local authorities have food standards enforcement powers that are on a par with hygiene enforcement powers.

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.

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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.

The current holistic nature of environmental health services should not be jeopardised through any consequent reorganisation of delivery of Food Controls. Also changes that would result in the transfer of staff from local authority services to a centralised delivery body are likely to have a detrimental effect on the resilience and ability to react in emergencies and incidents. As an example although the Comhairle only have two full time equivalent food staff, there are five authorised staff who can be called on in the case of recalls or national food incidents like the horsemeat substitution. This is mirrored throughout local authorities creating a much larger pool of professional staff to deal with incidents. Official controls delivery should primarily remain with local authorities as the food safety service is an integral aspect of the environmental health function and staff involved in the food safety service may be responsible for delivering a range of functions at food businesses.

The sharing of approved premises between the new food body and local authorities moves away from the argument that one body should be responsible for the enforcement of all food safety issues in a premises (dual enforcement could lead to confusion in the event of an incident. This change does not make practical sense in that if local authority staff are to be considered competent to carry out all other Official Controls at approved premises then they should be competent to issue the approval in the first place. Local authorities are best placed to be aware of and react to changes in approved premises and unapproved establishments rather than a remote centralised body who would have limited local

knowledge.

Food Standards enforcement in slaughterhouses and meat cutting establishments by the new food body removes an area of dual enforcement therefore would be welcomed.

Coordination of export certification and liaison with third countries would be welcomed, with actual delivery being retained by local authorities.

Any changes in this area should be considered carefully, taking account of the views expressed by SCOTSS and considering whether there is scope to identify separate solutions for individual parts of the Feed supply chain e.g. on farm activities; distribution; and production, ensuring that any solution does not have a detrimental impact on the wider Trading Standards function by Local Authorities.

Any changes in this area should be considered carefully so that they do not adversely affect the delivery of the wider environmental health function by local authorities. This may be an area where a flexible transfer approach to the enforcement role is adopted as for areas such as fishing there may be more suitable arrangements for providing service but for other areas such as game larders there is benefit in retaining local authority approach as officers may be visiting these areas for other duties.

Delivery of official controls relating to the supply and manufacture of materials and articles in contact with food, food additives and processing aids would be welcomed.

Provision of specialist advice to local authorities on food science, food technology and veterinary matters would be welcomed.

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.

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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.

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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?

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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.

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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?

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