

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 scope of the new food body must be extended beyond the current scope of the Food Standards Agency in Scotland if its establishment is to meet the Scottish Minister's commitment to improving public health through the provision of safe food and an improved and healthy diet.**
- **The new food body should clarify which roles, responsibilities and areas it intends to lead on as the Central Competent Authority and which other Competent Authority or Agency it will defer leadership to and work in partnership with.**
- **Aberdeen City Council will support the new food body's involvement in wider national issues such as alcohol and obesity as long as strategic leadership from the Scottish Government is implemented and maintained. Should local authorities assist in delivering these new areas of work extended resources should be provided.**

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?

- **Aberdeen City Council is of the opinion that the roles, responsibilities and functions, (in terms of diet and nutrition listed in Annex A of the consultation document) are sufficient? for the new food body.**
- **The new food body would be in a position to influence the food industry on food composition and portion size, and local authorities on the outcomes of food standards inspection and sampling programmes. It could also build service delivery partnerships with NHS colleagues and, where appropriate, highlight to the Scottish Government.**

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, in conjunction with Local Authorities, would be in an ideal position to take forward the Scottish Government lead on “Eating for Health - The Challenge” on food in the public sector, schools, hospitals, prisons, the workplace and the home.**

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.

- **Aberdeen City Council recommends that the new food body maintains the independent advisory scientific committee network currently in place, and seeks to establish additional international support, given the global nature of the food industry and the speed by which new practices are introduced.**

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.

- **Aberdeen City Council would suggest that the new food body should maintain its core principles both nationally and internationally, but with a special emphasis on research and surveillance issues which are particularly pertinent to Scotland.**

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.

- **Aberdeen City Council supports the new food body in leading the co-ordination of Scottish food and feed hygiene research and in partnership with NHS Health Scotland in respect of public health nutrition research.**
- **In respect of the profile as a research funder, Aberdeen City Council would recommend using existing links to academic institutions and international networks for overseas research.**

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.

- **Aberdeen City Council strongly recommends that the new food body maintains and strengthens the current working partnerships with the food enforcement community through the Scottish Food Enforcement Liaison Committee, their Sub Committees, Food Liaison Groups and individual Local Authority networks, in respect of food safety, food standards and nutrition policy. This network has a lengthy history of developing food safety policies and designing, co-ordinating and reporting on innumerable food surveys and sampling programmes.**
- **Aberdeen City Council also fully supports the continued use of the national UK FSS national sampling database in the recording of all survey and sampling data.**

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.

- **Aberdeen City Council supports any provision of additional statutory powers allocated to the new food body in order for it to be satisfactorily equipped to deal with any and all food related incidents.**

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.

- **The extension of existing powers for food where there are doubts over either its composition, description or labelling would enable enforcing authorities greater discretion when investigating instances of food fraud.**
- **Where the enforcing authority is investigating allegations of food fraud strengthening the enforcement approach will in the long term discourage this practice.**

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.

- **Aberdeen City Council supports official control delivery remaining with local authorities. It is vital that the current holistic nature of environmental health**

services should not be jeopardised through any consequent reorganisation of delivery of Food Controls. In particular, changes that would result in the significant transfer of staff from local authority services to a centralised delivery body are likely to have a detrimental effect on the viability of other essential environmental health services.

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.

- **A two tier approach will not meet the needs of local businesses.**
- **In June 2012 this Authority uncovered major fraud in relation to the export of fishery products bound for Russia. This may well have continued if it were not for the diligence of Local Authority Environmental Health staff**
- **Additional powers should be given to Local Authorities to issue all export certificates in which they enforce food safety legislation. This should reduce the risk of errors arising.**

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.

- **By maintaining the current working partnership with Scottish local authorities to develop a Scottish Framework Agreement similar to the one existing for the UK and to revise the Food Safety Code of Practice and the Practice Guidance documents in order to detail official control delivery.**
- **By ensuring that the local authorities are provided with suitable and sufficient resources in order to deliver official controls throughout Scotland, adequately and consistently.**

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 adopted by FSA has worked well it is recommended that the new food body builds on these existing arrangements. The new food body will also have to develop a relationship with the UK FSA.**

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?

- **Over the past thirteen years, the Food Standards Agency in Scotland has engaged with consumers in both policy development and the provision of information to a high standard. It is recommended that the new food body builds on existing arrangements.**
- **Arrangements currently include dialogue with the Scottish Food Enforcement Liaison Committee which takes account of consumer interests.**

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 do agree that the new food body should be independent from Government and the food industry.**

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?

- **Aberdeen City Council would recommend that the new Food Body considers the requirements of EC Regulations 882/2004 on official controls and,, in particular, determines the most appropriate methods to comply with Articles 3 and 4. The new Food Body will also need to establish a relationship with FSA UK and determine the appropriate liaison arrangements that will be required between both organisations.**