

## 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?

In our evidence to the Scudamore enquiry we expressed our opposition to the proposal for the formation of a new food body on the grounds that there is potential for increased costs and duplication of the work already carried out by the UK Food Standards Agency. Therefore if the new food body is agreed it should not produce additional regulations, create unnecessary additional burdens on business and should continue with the work already carried out by FSA Scotland under the auspices of FSAUK.

We do not believe that there should be any extension to the scope of the new foods body beyond what is already carried out by FSA Scotland.

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?

Having examined the various roles carried out by FSA Scotland, Scottish Government, and NHS Health Scotland in relation to nutrition and diet it is clear that there is duplication of activities and potentially some gaps. Therefore we believe that there should be a comprehensive review of the roles and responsibilities of the three bodies together with a gap analysis subsequent to which the role of the new food body can be decided.

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.

Please see answer to question 2

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.

Clearly the new food body needs to work closely with the FSA in London and UK Department of health to ensure no duplication of effort particularly with respect to research.

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 clearly advantageous that the new food body does focus its efforts on Scottish consumers although there is no doubt that surveillance activities

exist e.g. an FSA inspector in approved plants which is also inspected by local Authority Officers for activities which fall outside the approval then only one inspector should be involved.

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 Audit function in relation to Local authorities should be maintained to ensure that they are maintaining the level of resources needed to implement food and feed controls. As the FSA in London will continue to be the central competent authority and represent the UK as a member state with the EU it is important that the new body works closely with the FSA in London.

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.

- No

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?

The new food body should maintain the existing stakeholder engagement already undertaken by FSA Scotland not only with consumers, but also industry and Local authorities.

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.

- The Food Standards Agency in the UK has operated as an independent non ministerial body since its inception and as such has achieved high levels of trust from consumers and industry and we therefore agree with the approach as framed in the consultation document.

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?

- Comments