

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 Royal Society of Chemistry (RSC) welcomes the opportunity to respond to the Scottish Government's 'A Healthier Scotland : Consultation on Creating a New Food Body'
- The RSC is the largest organisation in Europe for advancing the chemical sciences. Supported by a network of over 48,000 members worldwide and an internationally acclaimed publishing business, its activities span education and training, conferences and science policy, and the promotion of the chemical sciences to the public. This document represents the views of the RSC. The RSC has a duty under its Royal Charter 'to serve the public interest' by acting in an independent advisory capacity and it is in this spirit that this submission is made.
- The RSC awards the Mastership in Chemical Analysis (MChemA) which is the statutory qualification for practice as a Public Analyst and Agriculture Analyst (www.rsc.org/MChemA). The RSC works closely with the Association of Public Analysts (APA) and its Training Committee to ensure that candidates have the appropriate skills and knowledge to qualify.
- The Royal Society of Chemistry (RSC) welcomes the proposal for the New Food Body (NFB) to be independent, transparent and at arm's length from Government to better serve the people of Scotland.
- Even though we welcome the NFB being at arm's length from Government, there will need to be clear routes of communication with the Scottish Government Health and Social Care Directorates and the Government's Minister for Health and Wellbeing.
- In principle, expanding the role of the NFB to address public health problems in Scotland is welcomed as long as the necessary scientific and technical expertise is sufficiently provisioned and adequately resourced.
- **With this in mind the role of Public Analysts would be of paramount importance.**
- The NFB needs to interface well with all relevant organizations and will also need to be adequately funded with appropriately-trained staff.

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?

- No comment

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.

- We need to better understand the interaction of food intake with human health and to provide food that is better matched to personal nutrition requirements.
- Nutrition is a major, modifiable and powerful factor in promoting health, preventing and treating disease and improving quality of life. Over-nutrition and reduced physical activity have contributed to the growth of diseases such as obesity. Whilst we do not have the statistics for Scotland, in 2006 24 per cent of adults (aged 16 or over) in England were classified as obese.
- Understanding the interaction of food intake with human health and providing food that is better matched to personal nutrition requirements is therefore essential.
- A greater knowledge of the nutritional content of foods will be required to understand fully the food/health interactions, which could facilitate more efficient production of foods tailored to promote human and animal health.
- The chemical sciences are key to identifying alternative/parallel supplies of 'healthier foods' with an improved nutritional profile. One of the main challenges is to produce food that reduces the fat, salt and sugar components that can be detrimental to health, while maintaining the customers' perception and satisfaction.
- The NFB, in its role of overseeing food standards and nutritional challenges facing Scotland, could ensure that these issues are addressed by funding research to be undertaken and to evaluate the latest research available.

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 staff will need to keep up to speed with the latest scientific developments for which access to primary scientific literature,

attendance at scientific meetings, participation on committees and the development of appropriate links with relevant researchers and others in the UK and overseas will be required.

- These measures would help to establish access to the expert advice both within the UK and internationally and also help raise the profile of the NFB.
- The recent horsemeat scandal has highlighted the sustained decrease in the number of Public Analysts within the UK over the past four decades and the resources available to them to undertake their job. **The NFB should ensure that there are enough Public Analysts available in Scotland and ensure that they are properly resourced.**
- This would allow Public Analysts to provide a more centrally co-ordinated, planned and proactive approach to ensuring the safety of food in Scotland, rather than the current reactive risk based system that operates at present.
- Whilst this would incur a cost, it would offer a far greater assurance of food safety and issues relating to food safety and adulteration could be identified much earlier. The result of a future horsemeat-type incident could easily be higher than the costs involved in providing adequate resources to Public Analysts.

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.

- Issues relevant to Scotland may change over time and so awareness of wider issues beyond current concerns of Scottish citizens would be potentially beneficial in the future. There are also economic benefits to be had from looking out-with national borders.
- Contributions to science and evidence programmes on wider issues with relevance to the UK as a whole may facilitate collaboration with other bodies within the UK, enabling valuable sharing of data, best practice, training provision etc. which over time will provide benefits 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.

- Some consideration may need to be given to other funding routes

within Scotland and the rest of the UK to ensure that the NFB, as a funder, can offer programmes that complement and enhance the research landscape in this area.

- By co-ordinating research across the food safety landscape, this body could ensure that research is being funded to cover all aspects of food science and food safety appropriately. This would also allow results to be properly disseminated and it would prevent research being unnecessarily duplicated.
- There is a concern that with only one body funding/co-ordinating all the research in this area, there is the possibility that important areas of research could be overlooked. There should be some oversight mechanism in place to identify areas of need and shortcomings with current research provision.
- Additionally, becoming a funder of research would inevitably raise the profile of the NFB, extending its influence beyond Scotland.

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.

- An independent evidence base requires an independent scientific process for which adequately trained and resourced personnel would be paramount.
- Important that sufficient sampling takes place so that food safety issues are picked up early and standards are ensured.
- Having a broad range of scientific expertise is important for ensuring that a broad range of challenges can be suitably addressed.
- Scientific and policy based staff should be able to forge strong links with the wider academic community in order to remain at the forefront of knowledge and be able to adopt and share best practise.

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.

- As well as being a driver for improvements in health through changing diet and improving nutrition, the FSA has the opportunity to ensure Scotland is continually researching and recommending new technologies that improve food safety and reduce food waste and the waste that comes from the packaging of food.
- **Food safety:** Technology breakthroughs in real-time screening and sensors are necessary to support rapid diagnostics to detect contaminants and ensure food authenticity and traceability; this includes detection of chemicals, allergens, toxins, veterinary medicines, growth hormones and microbial contamination of food products and on food contact surfaces. Technologies could be extended to address domestic food hygiene through visible hygiene indicators. More efficacy testing and safety of new food additives, such as natural preservatives and antioxidants is required, as is an understanding of the links between diet and diseases such as cancer. Further research should be done into naturally occurring carcinogens in food such as acrylamide and mutagenic compounds formed in cooking, with similar studies to encompass the effects of prolonged exposure to food ingredients.
- **Supply chain waste:** There is an unacceptable amount of food wasted in all stages of the supply chain. We need to find ways to minimise this or use it for other purposes. The UK food industry alone accounts for about 10 million tonnes per year (10 per cent) of industrial and commercial UK waste. Packaging and food waste are the two most significant waste issues for the industry. The main challenge is to find ways to minimise this waste or, within the context of lifecycle analyses, use it for other purposes.
- The food industry is a major user of packaging, which protects products from damage, deterioration and contamination. The chemical sciences have a role to play in developing sustainable packaging, which is biodegradable or recyclable and compatible with anaerobic digesters. These might include flexible thin films made from corn starch, polyacetic acid or cellulosic materials, which can withstand the chill-chain, handling and storage. There is also the possibility of developing food packaging that is compatible with anaerobic digesters. There are many potential uses for food waste, including producing high value biochemicals, compost and energy.
- The areas noted above are possibly areas where the NFB could increase its scope and remit in order to maximise its impact on the entire food process in order to improve the health and environment of Scottish citizens and create a more sustainable environment for food production.

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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.

- 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.

- An important aspect in assuring delivery of official controls, as required by EU Regulation 882/2004, is the provision of appropriate scientific services. The qualification for public analysts is well defined by statute. However, formation of the NFB provides an opportunity to strengthen other aspects of their associated laboratories including guaranteeing income and maintaining their expertise for the benefit of consumer safety.

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.

- Relationships with professional bodies including the Association of Public Analysts (APA), ourselves (RSC) and other member organizations with whom to liaise on training and skills issues.
- Note: the RSC provides the statutory qualification for public analysts, the MChemA (<http://www.legislation.gov.uk/ssi/2013/83/contents/made>)
- To this end, it may be prudent to include the RSC on any future list of organisations to be consulted for similar consultations.

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?

- No comment

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.

- Overall the RSC supports this proposal ensuring the NFB's

Independence 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?

- No further comments

