

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?

There is general agreement that the scope of the new food body should extend beyond the current scope of FSAS however, it is essential to ensure that it does not duplicate the function of other bodies and that its work is complimentary and timely. For example NHS Health Scotland has a function relating to the introduction, development, implementation and evaluation of schemes tackling alcohol and obesity.

Perhaps there is a need to be explicit about what is required, identify the most appropriate lead agency for each of these functions and create a mechanism for them to work together ensuring a holistic approach that engages with relevant key stakeholders to advise & support the national agenda.

There is also an opportunity as part of this process to identify any gaps and how these might best be addressed.

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, although, as above, to ensure a holistic joined up approach, a mechanism for working closely together is important so that the science, policy, delivery and monitoring is captured.

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.

As above. Clarity is sought as to current roles and responsibilities of both the FSAS and other bodies, to consider what is required, identify the most appropriate lead agency for each of these functions and create a mechanism for them to work together. In considering additional roles for the

FSAS these will require to be identified and consulted upon.

The FSA should continue to work with other bodies such as the British Dietetic Association to deliver accurate and practical public health messages to the people of Scotland.

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.

As above, to ensure a holistic approach, organisations engaged in work in this area need to be working closely together and to ensure engagement of the wide spectrum of key expert bodies and stakeholders to include: The British Dietetic Association, Universities, Scientific Advisory Committees. It will be important to identify resources/people who would be in a position to advise.

The new food body needs to be able to access expertise beyond Scotland. It is neither practical nor possible to be able to address all areas of nutrition across the life course without access to a wider spectrum of nutrition intelligence from across the UK (or even beyond).

Recognition of the dearth of practical nutrition expertise that exists at the coal face also needs to be recognised.

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 critical that research and surveillance is pertinent to Scottish citizens but that may mean that activity occurs beyond Scotland. For example, if the work requires a bigger sample, if the learning can be generalised or if there is an opportunity to work in partnership with other agencies across the UK or internationally. Where issues are broadly similar across the UK collaboration is important.

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.

A joined up approach would help to ensure that research is focused and duplication is limited. Equally, a portal which helps people identify common areas of research which are underway could also be beneficial.

A lot of public health nutrition however, crosses the boundaries of health, social care and other areas. Responsibility for this may be possible within a new FSAS but there is some concern regarding this within an FSAS as it currently stands with the focus largely on nutrition guidance.

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.

The establishment of an evidence base requires the development of an explicit and transparent methodology and participation by representatives of key groups and disciplines e.g. SACN, Scientific Advisory Committees, Universities, Professional Bodies etc.

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.

There needs to be an easy way of enforcing any legislation.

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

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 above. There is some concern regarding the new body taking on roles

currently carried out by other organisations.

This does however, provide an opportunity to identify any gaps and look at how these might be best addressed i.e identifying the most appropriate lead agency and creating a mechanism for them to work together.

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.

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.

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 Food Body needs to be developing links across the full range of expertise and organisations involved in food and nutrition to include: The British Dietetic Association, Universities, Third Sector etc

It needs to be establishing links across the departments and organisations of the Scottish Government to include health, social care, education, environment etc recognising the breadth of areas that public health nutrition covers and the important role it has in all of these areas.

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?

It needs to have explicit 'communication' and 'informing, engaging & consultation' plans that employ a wide range of techniques that are appropriate for the designated target audiences including social media and face to face.

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.

Examples already exist in the Scottish Government for non departmental government bodies.

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

