

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?

Aberdeen & Grampian Chamber of Commerce (AGCC) food and drink members were broadly of the view that the scope of the new food body should remain in line with what the Food Standards Agency (FSA) currently does in Scotland. They regarded the following functions as fair and proportional, and as areas that should be prioritised by the new food agency;

- Food and feed safety and hygiene enforcement
- Food and feed standards and labelling enforcement
- Food and feed law enforcement
- Science and evidence gathering
- Audit of food and hygiene controls delivered by Local Authorities

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?

Food and drink members broadly agreed that the new food body and Scottish Government should continue the arrangements for independent and partnership work outlined in Annex A.

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.

AGCC members expressed concern that extending the scope of the new food body in this respect would cause confusion within the industry.

The Government must be able to make a compelling case that the benefits of new roles, responsibilities or functions outweigh the costs of any implementation and administration.

It is important that any new organisation created is not so large that it cannot make decisions quickly or respond to the needs of consumers. A body with more roles and responsibilities must not impact negatively on the ability of business to deliver for customers and economic growth.

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.

AGCC members would welcome an approach that utilises independent advice. However, this has a cost implication and if it is to be utilised fully and with the most influence, the Scottish Government will need to commit significant financial resources to this ambition. This must not increase the growing cost burden business face. 70% of businesses believe that cost is impacting on growth. We are unsure that spending more money on consultants will benefit the industry significantly.

The new food body should link to existing scientific committees operating throughout the UK and internationally as this will avoid duplication.

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.

Food and drink businesses were of the view that a dual approach should be taken. Scottish food links into the wider UK food chain, as does food produced elsewhere in the UK to the Scottish food chain.

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.

Again, this ambition has a cost implication and if it is to be utilised fully and with the most influence, the Scottish Government will need to commit significant financial resources. However, we would expect to see a detailed and compelling business case before any implementation decisions. Only this will fully satisfy our members who are already facing significant cost increases.

In this region both the James Hutton Institute and Rowett Institute of Nutrition and Health have excellent reputations for research into food, diet and nutrition. It is important that the Government does not simply duplicate existing activity. Institutions such as these should be utilised as widely as possible to raise the profile of the new food body as a research funder.

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.

N/A

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.

Scotland's has a good reputation for food quality and purity. Feedback from particular members has suggested that if this reputation is to continue, there should be more emphasis in protecting Scotland's health status in agriculture.

For example, more work needs to be done to limit the import of produce which bears quarantine risks to Scotland (cattle infected with Schmallenberg Virus, blue tongue and so on). Members regard being able to declare that their produce is free of all such diseases as a very useful and effective marketing tool.

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.

N/A

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.

AGCC members did not see any reason for the new food body to take on any further roles and responsibilities. They believe that such an approach would create unnecessary confusion for the industry. This would also increase costs without any clear benefit for industry or consumers.

Any additional roles and responsibilities would also have to be adequately funded in order for the new agency to function effectively, and members do not think can be delivered with the current squeeze on public spending. The only other way this could be funded is by passing costs on to business which is unacceptable.

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.

Members were wary of the proposals to centralise functions currently controlled by Local Authorities to the new food body. There were concerns that this would result in loss of expertise, staff and good practice and would ultimately result in businesses facing unnecessary delays to modify production processes, import and export products, and for inspections to take place.

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.

N/A

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.

N/A

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?

Food and drink members believe the current approach utilised by the FSA in Scotland works well and this approach should be built on. In particular it should promote the provenance of Scotland's food and drink industry and promote good practice from producers who consistently maintain the best standards of safety, hygiene and labelling. Such promotion to the consumer encourages more people to buy Scottish produce.

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.

Members have expressed concern about the expected wide remit and responsibilities of the new food body, and have suggested that the organisations proposed remit would cross various ministerial portfolios. This would have a significant impact on accountability and members would like to see the remit adjusted to make accountability more clear.

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?

A survey of food and drink businesses conducted by AGCC in 2011 showed that the costs of doing business was the issue of greatest concern to businesses. The new food body in Scotland must not increase costs to businesses by complicating the regulatory regime. It is not clear how this can be achieved under the proposals presented. We would however welcome a clear and compelling business case on the proposals.

Overall, food and drink businesses want one body to oversee all regulatory functions of the industry, with the appropriate level of knowledge, skills and authority to implement and regulate.

