

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 new food body should be the central point of information and evidence on food, nutrition and food safety for Scotland. As such it should set dietary targets for Scotland and co-ordinate policy on food in the public sector and in the home.
- The new food body should lead a wide partnership on healthy living in relation to food / nutritional/dietary information, and food intake and energy balance.
- Importantly the new food body should extend its integration and communication with other agencies and stakeholders to facilitate information exchange, more effective delivery and communication of outputs and to avoid duplication.
- The new food body should extend its scope to enhance the testing of imported food, and to place imported – especially manufactured foods – under more scrutiny for authenticity and traceability.
- The new food body should take over the Cooking bus from NHS HS as a means of reaching out to consumers and providing clear food safety and diet and nutrition advice.
- Although Scotland is not the member state, the new food body should have a more active and clearly defined role in representing Scotland within the EU, especially in EFSA, and also globally such as within the FAO and WHO interactions.
- To ensure continued delivery of the consumer focussed messages there is a need for the new food body to extend and increase its scope for communication.

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?

- This is a complex landscape with many actors. The crucial aspect of this is that the diet and nutrition messages to the consumer are consumer-focused, clear, consistent evidence based, proportionate and practical.
- It is not clear that these requirements either can or should be delivered by a single body; hence there is a strong case for continued partnership working between the new food body and Scottish Government. Indeed there is also a case to support the ideas that the new food body should collaborate more widely with other evidence providers and agencies to ensure the most appropriate consumer focused output is delivered.

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 should take on the role, currently carried out by Scottish Government, of engaging with the food industry on marketing, advertising and promotions.
- The new food body should consider taking on the role of monitoring food advertising targeted at children as a means of managing the exposure of children to nutritionally inappropriate advertising.

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 new food body must continue to be evidence based and use the best quality independent scientific advice available.
- Although the current advisory committees may provide a good source of evidence, they tend to be too slow in providing advice.
- This raises the question as to whether a similar level of advice would be available close at hand through Scottish Government funded research; so providing a more rapid response framework for the new food body.
- The current committee structure also appears to lack the ability/mechanism to co-ordinate and collaborate on subjects which require cross committee consideration.
- The current committees' membership appears to be fixed over the period of appointments of members. This runs the risk of having a somewhat fixed expertise based over that period. It is important that the sources of advice are flexible enough to meet changing demands over time.
- The new food body should undertake a review of the current science advisory committees to assess whether they are fully fit for purpose, or whether other more flexible, and responsive frameworks could be developed to deliver independent high quality advice in a more timely manner.

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.

- The new food body should focus its research and surveillance activities on issues affecting the Scottish population as a priority, but where there are issues of common relevance there is added value in working with other science and evidence programmes in the UK or globally.

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.

- Yes, the new food body should take on the responsibility for coordinating the Scottish Government funded research on food safety and public health nutrition. In addition, the new food body should review the possible benefits of also including the outputs from veterinary and food chain surveillance activities as part of the coordination activity.

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 new food body needs to continue to operate in a consumer focused, evidence-based and proportionate manner. The evidence base should continue to comprise robust scientific evidence gained from global science sources. However, to achieve consistent consumer focus and proportionality, the new food body should perhaps seek to develop better links with industry, enforcement and consumer bodies to ensure that policy is not only evidence based and proportionate, but is always practical, and delivers the desired outcomes for both regulators and consumers.
- One critical element to establishing a strong independent evidence base is that there should be a strong science focused team in the new food body, led by a competent chief scientist who has the breadth of knowledge and practical experience to cover the wide remit of the organisation.

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.

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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 new food body might consider increasing the penalties for contraventions of food standards and safety laws in Scotland, since current penalties may be inadequate .

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.

- See Q1

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.

- The flexible approach proposed in para 48 seems sensible.

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 new food body should undertake all relevant audits in Scotland, and should expand its capacity ensure this is possible.

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.

- It would be highly beneficial if the new food body were able to play a central coordination role in all aspects of food safety, food borne disease, nutrition policy, surveillance and evidence gathering so that communication amongst all the activities was as integrated as possible.

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 Scottish Food Advisory Committee provides a forum for engagement but has not always had high levels of attendance at its open meetings. The role of the committee is important, but the new food body should perhaps review the format, timing and location of the meetings to see if there are ways to increase consumer engagement.
- Expanding the new food body's activities in road shows and engaging with consumers in shopping centres, community centres, contributing to the Curriculum for Excellence teaching within schools etc should be considered and evaluated as a means of achieving better information and advice delivery.
- Food safety and nutritional issues can be complex, and it is important that as part of engaging with consumers to develop policy and provide information, sufficient effort is placed in ensuring the appropriateness of the knowledge exchange. The new food body could establish focus groups to evaluate and provide advice on the types of knowledge exchange and information resources that might be most engaging for consumers.

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 new food body should remain independent, in the sense of being a non-ministerial department with a non-executive board, and it should be accountable to the Scottish Parliament. In addition, it would also be important to retain the role of the Scottish Food Advisory Committee, as an advisory committee; it should not simply be transformed into the board of the new organisation, which should be appointed de novo.
- The safeguards listed in para 63 would be an important contribution to the new organisations transparency.
- However, it would also be important for the new food body to include as part of it's of governance means whereby it can interact with, collaborate and form partnerships with industry and other interested parties. This may be seen as a challenge to the overall 'independence' of the new food body, but achieving a transparent relationship with industry and other interested parties may provide significant benefits to the organisations overall aim of putting consumers first and being evidence based and proportionate.

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?

- There is a need for the new food body to have an ambitious vision and increased scope. However, it will be critically important that this is properly resourced. There is now the opportunity for a flagship, innovative, science led organisation to develop and it would be important to ensure that sufficient support in terms of both staff and funding is provided to allow Scotland to benefit from this excellent prospect.