

New Food Body 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?

Comments: We would support extending the scope of the new food body beyond the current scope of FSA if in doing so the New Food Body would provide improved strategic leadership and better co-ordination of multi-agency service delivery. The areas we feel that the new food body could have an increased role are obesity, provenance, food poverty and security.

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?

Comments: Yes

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.

Comments – We believe the areas suggested in the consultation document are the appropriate functions for the new Food Body.

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.

Comments: We suggest the new Food Body establish links to HPS, research facilities and academic institutions in Scotland. This would be particularly beneficial in light of the incidence of VTEC in Scotland and the work that has been carried out in Scotland over a number of years. We would also suggested continued and increased links with international organisations

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.

Comments: The primary role of research and surveillance should be for Scottish citizens with particularly emphasis on the problems specific to Scotland i.e VTEC, obesity, food poverty. However this should be undertaken in line with the rest of the UK and other countries in order to share information, identify trends and best practice.

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.

Comments: We would support the new Food Body being responsible for food safety research, but would suggest the new Food Body works in partnership with the NHS on public health nutrition research.

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.

Comments: We would recommend that the new Food Body works with SFELC and local authorities through the Food Liaison Group network when developing policy on food safety and standards.

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.

Comments – Greater enforcement powers are needed to deal with food standards issues including a range of notice procedures similar to those available for food hygiene. Consideration should be given to fixed penalty notices (for Food Hygiene and Standards) and an effective mechanism for reporting breaches of food legislation to the Procurator Fiscal, with fines set at an appropriate level so to be an effective deterrent.

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.

Comments: Same as Q8.

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.

Comments: Same as Q1, however we would stress the need for a multi agency approach to effectively tackling these issues, particularly in relation to obesity and food poverty.

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.

Comments: We believe the existing partnership between local authorities and FSA works well and the successful partnership approach in Scotland should be the building block for the new Food Body.

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.

Comments: We would wish to see the existing Food law Code of Practice continued and reviewed to reflect specific needs relating to Scotland. We would also recommend the new Food Body prepares a Scottish Framework agreement similar to the framework agreement that currently exists and that the framework agreement is formally recognised and is binding on organisations delivering official controls.

13: Are there any additional or alternative relationships that you would help the new food body achieve the Scottish Ministers' objective of longer, healthier lives for the people of Scotland? None other than those previously mentioned.

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?

Comments: We believe the existing networks created by FSA work well and should be continued into the new Food Body.

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.

Comments: Yes.

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:

We would recommend that the creation of the new Food Body is an ideal opportunity to consider licensing of food businesses. Licensing of butchers shops was introduced after the Central Scotland E coli outbreak and operated successfully. Licensing would provide a means of prior approval to determine that a food business is able to operate safely and in line with legal requirements. Such arrangements already exist for Approved Food Establishments and other food businesses need to comply with licensing arrangements regarding the sale of alcohol, street trading and late hours opening. The introduction of pre-approval licensing would protect consumers and reputable food business operators.