

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?

- no

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

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.

- no

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.

- Make use of Scottish laboratories such as Marine Scotland, Dunstaffnage Marine Lab., to utilise and enhance Scottish expertise for the benefit of local shellfish producers and the country as a whole.

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.

- All matters relevant to Scottish citizens and export markets.

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.

- No, a Scottish Government department should be responsible for this; should have greater expertise in this field. Do not dilute the function of FSA.

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.

- Use Scottish universities and research establishments that have better understanding of Scottish circumstances, environment and habits.

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, this is a matter of properly applying existing statutory powers and not undermining local food enforcement authorities.

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.

- Ensure the new FSA trust the local food enforcement authorities to do their job, enforcing regulations with local businesses to safeguard public health.

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.

- No

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.

- Trust local authorities to know their area, the business therein, and apply regulations in a sensible manner to suit local circumstances. Too often local EHOs' autonomy has been undermined by the FSAS.

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.

- For shellfish controls, work with local EHOs and the shellfish operators to ensure the official control programme is carried out in a practical way that takes account of local conditions (eg. Remoteness of access).

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.

- no

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

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.

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?

- We would like to see the new FSAS working more closely with Scottish laboratories and research bodies, to develop and retain expertise. In the shellfish sector, the FSAS relies entirely on advice from CEFAS, Weymouth, at the same time as awarding CEFAS the contracts for almost all official control monitoring tests. This constitutes a conflict of interest, and also undermines Scottish capability to carry out testing required by the industry. We'd also like to see EU regulations interpreted/implemented with regard to how this is done in other EU countries. (Eg. Depuration times, 42 hours in the UK, 36 hours in Ireland, 12 hours in Spain; interval between testing of algal toxins when closed: 1 week in the UK, 48 hours in Ireland). Harmonisation would reduce the burden on Scottish businesses without compromising food safety, make us more competitive in an international environment.