

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?

- YES
This is an ideal opportunity to extend scope. Public health issues are split and shared with different bodies; a New Food Body could take a lead on ensuring clear public information, health claims and contaminant testing. Testing for many contaminants is currently done by the Chemicals Regulation Directorate; efforts should be made by the New Food Body to make these results available so that there is transparency and ease of availability for members of the public. At the same time it could be counter-productive having too wide a remit. Scottish Government should retain a lead in overall Public Health issues with links to and input from the Food Body and the NHS.

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
We agree that the New Food Body and Scottish Government should continue with their respective roles and areas of cooperation as outlined in Annex A. Effective links with other agencies and bodies on shared public health concerns are important. Transparency of information that is easily accessed and understood by all is essential.

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.

- YES
Strong lead and support from the New Food Body for small and medium food related businesses would be valuable. The suggested ways of doing this by 'Healthy Living' and 'Healthy Eating Schemes' and giving technical support to reformulate products is reasonable.

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 Food Standards Agency (Scotland) has performed very well in

commissioning research and using science based evidence in formulating their policies. The New Food Body should continue these activities and have good links with Scottish Universities and other Government departments and be able to develop effective surveillance programmes. There is concern that some surveillance has not been effective so the new Food Body must be able to take steps to rectify this. Testing programmes should be clearly relevant to Scottish conditions. Information should be available quickly as results are often too late and already out of date and superseded by events.

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.

- There should be a strong focus on research and surveillance with relevance to Scottish conditions. There should be close links with Scottish Universities and research institutes within Scotland but there must also be cooperation and sharing of information on food and feed-related research within the UK and the European Union. There is much valuable research and experience available in the EU and Scottish links should be developed.

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
Responsibility for the coordination of Scottish Government funded research on food safety and public health nutrition would reasonably lie within the remit of a New Food Body. The current responsibilities of the Food Standards Agency (Scotland) on food safety and nutrition and labelling should continue.

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.

- Please see the answer to Qn. 5; improved links with the education sector would be useful.

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.

- The FSA (Scotland) already has wide powers which must be retained. Enforcement strategies must be reinforced with improved surveillance

and penalties that reflect the seriousness of contraventions. Food importations to Scotland and the UK must continue to be under surveillance so effective links must be made with bodies that can supply specialised information and evidence. In the Scottish Beekeepers' Association we are concerned that the quality of Scottish Honey is upheld and that importation of honey is kept under surveillance. There is much information on the problems of misrepresentation of honey on the international market and its adulteration which causes concern.

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 organisation will have to continue with all the roles of the FSA in Scotland. If other related areas are to be included then substantial additional resources will be required to allow the New Food Body to carry out its functions. We note the other responsibilities that have been suggested such as additional regulatory and enforcement supervision. We are broadly in agreement that wider responsibilities would be reasonable for the New Food Body to assume and could have greater impact on public health and well being.

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.

- YES
Widening the role of the New Food Body to cover responsibilities of the Local Authorities could be valuable but should not be rigidly applied so that decisions could be made at a local and national level depending on circumstances and need. Beekeepers are considered to be primary producers and the majority of members of the Scottish Beekeepers' Association are 'small scale' producers. We accept that the monitoring of primary honey production and the outcome and planning of sampling and checks on veterinary residues and the presentation of honey for market would best be served by a single new body.

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 New Food Body should continue to supervise delivery of official controls within Scotland. We would like to see the highest standards applied to all monitoring and especially to Scottish products to ensure their international standing. This will require additional resources and continuing cooperation with other bodies within the UK.

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.

- Full representation will be required for food and feed safety, diet, nutritional standards, labelling with all national bodies and the EU.

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 issues of diet and nutrition have already been discussed and are well known. This can be a primary responsibility of the New Food Body but factors such as poverty, unemployment and social deprivation, mental health problems all play additional roles. Valuable relationships with other sectors would no doubt help the New Food Body.

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?

- Strong contacts with the media and with educational bodies are required. The New Food Body will require to have a strong group within it which is involved directly with the media and the public.

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.

- Broadly we would agree with a degree of independence from government but for full effectiveness this will require additional support and finances as well as robust enforcement and legislation.

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?

- None