

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?

- NHS Ayrshire & Arran welcomes the opportunity to contribute to the consultation on the creation of a new food body for Scotland. It is our firm view that good quality, safe, affordable food is essential for health. Furthermore, we welcome the fact that the Scottish Government considers food and health an important public health priority alongside other topics such as smoking and alcohol.
- We would support the extension of the new food body to include a remit for tackling obesity, tracking and measuring food poverty, and enhancing consumer information such as advising on health claims. While alcohol consumption should be considered as part of dietary intake, we do not think the new food body should have the lead remit for alcohol consumption as this warrants attention as a separate public health issue.
- At present the Food Standards Agency in Scotland has extensive expertise in the technical and scientific aspects of public health nutrition and, in our opinion, performs these functions well. If the scope of the new food body were to extend to include a wider remit of tackling obesity, then it would be necessary for the new organisation to appoint staff with expertise in the application of nutrition science into practice.
- Currently there are a number of national bodies involved in improving diet and as a consequence it is not always clear who is responsible for what, giving rise to confusion and the potential for duplication. The creation of a new food body would provide an ideal opportunity to clarify the role and remit of the new organisation and that of its key partners.
- We would support and welcome the new food body taking a stronger leadership role in all aspects of public health nutrition to ensure the effective use of public resources and to achieve a coordinated, joined up approach.

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?

- We believe the current arrangements for partnership working should continue however there is scope for this to be improved. As previously mentioned greater clarity is required on who is responsible for what.
- It is essential that the new food body develops advice based on the most up to date evidence.
- In order to gain public trust and confidence, it is important for the new food body to be independent and to operate in an open and transparent manner.

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.

- We believe the new food body should have a key role in the leadership and implementation of the Obesity Route Map.
- If the new body takes on wider responsibilities than those currently fulfilled by the Food Standards Agency Scotland, then it will need to develop stronger relationships with a range of other partners. For example, the consultation suggests the new food body could have a role in the interface with the education system, therefore, it would need to develop closer relationships with Education Scotland and NHS Health Scotland who currently play a lead role in this area.
- The consultation suggests the new food body will be responsible for providing information to health professionals. To date, NHS Health Scotland have played a key leadership role in this area and have developed strong and effective partnerships with nutrition/dietetic staff in territorial NHS Boards. In contrast, the Food Standards Agency Scotland has very weak links with Board public health nutrition professionals and therefore these relationships would need to be established and strengthened.
- If the new food body were to have a remit in reducing food poverty and tackling nutrition-related inequalities, then the new organisation would need to develop expertise in this area.
- We would support the new food body taking the strategic lead for the Healthy Living Award for caterers and the Healthy Living Programme for neighbourhood shops. If it were to have responsibility for these programmes, then we propose it would also make sense to consider whether the new food body takes the strategic lead for Community Food & Health Scotland, especially if it is to have a remit for food poverty.

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.

- There are a number of leading academics with expertise on a variety of public health nutrition issues in Scotland that the new food body should access. In addition, there are a number of experienced public health nutrition professionals working in research institutions, territorial NHS Boards as well as NHS Health Scotland that the new food body should draw on for advice.
- When the new food body is created we believe it will be important for independent expert advice to continue to be sought from the UK wide Scientific Advisory Committee on Nutrition (SACN) and its subgroups. It would be a waste of resources and duplication of effort to attempt to replicate SACN's function for Scotland only.

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.

- On the whole, nutrition science that underpins the nutritional needs of the population does not differ across the UK therefore it makes sense to continue to contribute to research conducted on a UK wide basis. However, we believe there is a need to develop the research base on effective, practical interventions to improve diet and nutrition in Scotland, across the general public and a variety of population groups including infants, children and young people and low income groups in particular.

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 be responsible for the coordination of Scottish Government funded public health nutrition research as this will result in a more coordinated approach and reduce duplication. It will be important for the new food body to build on the existing reputation of the Food Standards Agency Scotland for high quality research and surveillance.
- Building a partnership with the Chief Scientists Office as an authoritative and credible research funder would help raise the profile of the new food body. Alternatively, will the new food body have its own Chief Scientist?

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.

- It is important that the new food body operates and commissions research that is independent from the food and drink industry and any other body/organisation where competing interests may arise.

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.

- In general we believe the new food body should have increased statutory powers to enable it to enforce any new future regulations that may be introduced, for example measures to reformulate the nutritional composition of manufactured and processed foods by reducing the fat, sugar and salt content.

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.

- No comments.

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 comments.

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.

- No comments.

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.

- No comments.

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.

- As mentioned previously, it will be important for the new food body to develop stronger relationships with public health nutrition professionals within the territorial NHS Boards.

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?

- NHS Health Scotland has a significant role in communicating with the public on a range of food and health topics, therefore, future roles and responsibilities will need to be clearly identified and shared with stakeholders. It will be important for the new food body to publish a communication plan.

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.

- We believe a fundamental principle of the new food body should be its independence from the food and drink industry. In addition, it is essential

that the new food body is independent from Government as this will remove any political interests.

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?

- No further comments.