

## 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 body should regulate the entire food chain from farm to fork. This would include on - farm checks of animals as that is the starting point for meat and the EU is placing increasing emphasis on Food Chain Information as part of their modernising meat inspection agenda. To make this really effective and create new synergies and opportunity for increased efficiency, and better use of scarce resources, the functions of the Animal Health Veterinary Laboratories Agency in Scotland relating to on farm testing should be brought in to the new food body. Consideration should also be given to re-organising the FSA and local authority inspection teams to get wider coverage of premises making further processed products and food retail and food service businesses. These are priorities rather than using resources on food poverty, food security, sustainability, et cetera.

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?

- No Comment

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 Comment

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 constituent countries of the UK have leading expertise in certain aspects of this work. At present FSA London commissions research which is available to other parts of the UK. In other fields, the expertise is in Scotland and research commissioned by the Scottish Government is shared similarly. The priority should be to continue a good level of collaboration and co-operation and for Scotland to separately prioritise and fund Scotland specific projects.

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.

- See answer to Q4 above.

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.

- Agreed, the quality and relevance of the Scottish commissioned work should be allowed to speak for itself. The results will build the reputation if the quality is there. There are strong quality assurance and robust audit arrangements for fresh meat production in Scotland. These should be used by the new food body to evaluate risk and reward performance. This could free up resources to tackle food safety and standards in premises which were not part of quality assurance schemes.

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.

- In relation to meat production, part of the farm to fork approach should be the establishment of a single effective animal identification system, electronically based and building on the system already in place for sheep.

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 same considerations and powers which already apply to food **hygiene** should apply to food **standards** in view of the recent horsemeat scandal, This would require legislation on the publication of food inspection results, new sanctions such as administrative penalties, improvement or remedial action notices, detention of food not meeting the required standard or labelling

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.

- Apart from those listed at Q8, comparison with the food hygiene controls might suggest additional measures. Financial resources are an important consideration and it is important that the Scottish share of the current FSA (UK) budget is transferred to Scotland as soon as possible

to avoid it being reduced by further expenditure reductions imposed by the UK Government.

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. Good veterinary resources are essential to the maintenance of public health and animal health. At present, such resources in Scotland are disparate with “Government”, in the shape of the FSA, AHVLA and Scottish Government all managing a corps of vets. These could be brigaded more effectively. In the case of meat animals and meat production, FSA and AHVLA would sit comfortably together. Bringing AHVLA within the FSA would lead to a single management command and increased flexibility to fully deploy vets flexibly and cost effectively. In the event of a national outbreak of animal disease, Scottish Government would lead and a singly managed force of vets under Scottish control would be at its disposal and under direct command. Consideration should also be given to transferring the testing of meat for veterinary residues from the Veterinary Medicines Directorate to the new food 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.

- Yes, local authority coverage is patchy depending on the resource and priority given to food standards by individual authorities. Thus, there is a danger that potential risk are either not identified, or not inspected. In the abattoir sector, where the risks are low, there is full time veterinary supervision during the time the business is operating. Businesses carrying out further processing (e.g. making ready meals) and retail food outlets are generally higher risk but have little supervision at present. Amalgamating the FSA and local functions with a single inspection force would offer better use of resources and better control of food hygiene and standards.

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.

- An adequate risk based programme of inspection and sampling.

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?

- Consumer representation in Scotland has been going through a period of change. Consumer Focus Scotland was the main body but not anymore. The Citizens Advice Bureaux, with its network of offices throughout Scotland would be well equipped to do this, with appropriate strengthening and support.

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?

- No