

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?

SFQC believe that the scope of the new food body should extend beyond the current scope of the FSA in Scotland. However, SFQC does not believe that the scope of the new food body should extend into areas of public health, *“for example by introducing more health based schemes to tackle problems like alcohol or obesity, tracking and measuring food poverty”* as suggested in the consultation document.

SFQC believes that, as with the current scope of the FSA in Scotland, the scope of the new body should focus on overseeing food standards within Scotland. SFQC believes that the scope of the new body could be expanded to include food labelling standards with regards to for example assurance of provenance.

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?

SFQC believes that 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.

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.

N/A

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.

SFQC believes that the new food body should take steps to ensure that it has good connections with the food and public health scientific communities in Scotland. The Scottish scientific community should be able to provide independent analysis and expert advice to the new body. There should also be scope for the new body to seek independent advice from other arms-length government bodies for example SASA.

It will also be important for the new body to be able to access independent expert advice from outwith Scotland, particularly in relation to situations whereby food standards problems originate elsewhere.

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.

SFQC believes that the new food body, as a Scottish Government funded entity, should focus its research and surveillance activities on issues that are particularly pertinent to Scottish food consumers. However, SFQC believes many issues falling under the remit of the new food body, that are faced by Scottish food consumers, will also be common to issues elsewhere in the British Isles and Europe. SFQC therefore believes that it will be important for the new food body to have open communication channels with similar bodies across Britain, Ireland and Europe.

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.

SFQC believes that the new food body should be responsible for the coordination of all Scottish Government funded research on food safety. SFQC finds it difficult to take a view as to whether the new food body should have responsibility for Scot Gov funded research into public health nutrition – SFQC would imagine that NHS Scotland and Scot Gov“ Healthy Eating” initiatives would have a roll to play in public health nutrition research.

SFQC believes that it will be important for the new food body to establish and maintain good communication channels with research institutions across the UK and beyond in order to raise the profile of the new food body as a research funder.

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.

SFQC believes that it will be important for the new food body to form working relationships with relevant research institutions in Scotland across the UK and beyond in order to help establish a strong independent evidence base for food safety, food standards and nutrition policy.

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.

SFQC doesn't believe that the new food body would need further statutory powers beyond those currently in place and those proposed within the consultation.

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.

SFQC agrees that it is essential to have effective deterrents to fraudulent and negligent activity in place in order to prevent incidents such as the substitution of horse meat for beef.

SFQC agrees that the new food body should have a robust regulatory enforcement strategy to ensure that proportionate, effective and dissuasive sanctions are in place and that criminal offences for non-compliance / contraventions of both food standards and safety law are retained.

SFQC has no further comments on this issue.

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.

SFQC believes that the new food body should take additional responsibility for official controls relating to animal health and byproducts, TSEs, food labelling, provenance and dairy and egg production controls. This will ensure that the organisation has a truly 'joined-up' farm to fork remit which will be in the best interests of safeguarding the health and wellbeing of Scottish consumers.

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.

SFQC believes that there is an ideal opportunity with the formation of this new food body to change the way in which responsibility for delivery of official food and feed controls is achieved. With a broader remit for maintenance of food standards from farm to fork SFQC believes that the new food body should be tasked with management and monitoring of all official controls. This will be to improve the ultimate safeguarding of consumer health by ensuring there is a more complete and comprehensive application of controls across the supply chain. This will enable a more uniform and consistent approach to controls than happens at the moment.

There is currently widespread disparity between application of controls across Scotland. This is evidenced by a comprehensive review of official datasets.

For example it is apparent from official data that across Scotland the number of broadly compliant food servicing establishments varies from 74%

to 96% across the different local authority areas. In addition 20% of these establishments are not yet rated for intervention in Glasgow and yet the equivalent figure in Dundee City is 1.7%. Furthermore the proportion of improvement notices issued across Scotland's four largest city authorities varies from 0.6% in City of Edinburgh to 9.4% in Glasgow. Whilst there will be both individual variations and specific affecting factors within and between authorities few people can realistically expect food servicing establishments to be 15 times more compliant in Edinburgh compared to Glasgow.

Food standards are required to protect consumer health and welfare and it surely cannot be in the Scottish consumers' interest for there to be such a potential "lottery" over application and delivery of the control measures designed to safeguard them.

SFQC as a specialist food certification business would welcome the opportunity to work with the new food body and partner stakeholders to assess the opportunity to deliver a more consistent application of official controls across Scotland as a way of delivering better food standards for Scottish consumers.

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.

SFQC supports the proposal to extend the new food body's remit to all new areas outlined in paragraph 48, especially relating to export health certification and liaison with third countries and delivery of official controls relating to animal feed hygiene and standards and those controls and related monitoring activity during primary production

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.

SFQC has no comment to make on this

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?

SFQC believes that in order to effectively engage with consumers, to aide in developing policy and in the dissemination of information and advice, it will be important for the new body to have a presence at food and drink related events.

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.

SFQC agrees with the suggested approach to ensuring the new food body's independence from Government and food industry.

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?

SFQC has no further comments to make