

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?

- We do not believe that the scope of the new food body should extend much beyond the current scope of the FSA in Scotland.

In particular, we do not agree with the suggestions made by some that the new food body should be involved with food security, sustainability or wider environmental matters.

However, we do recognise that there are considerable advantages and savings (in both time, money and bureaucracy) if the farm inspections for food and feed controls currently carried out by Scottish Government (on behalf of FSA), local authorities and AHVLA inspections relating to food were all carried out by the new food body. (We recognise that the future of AHVLA is uncertain after 2014.)

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?

- BASC believes that the existing arrangements as outlined in Annex A are sensible although there could be clearer delineation to prevent duplication. We recommend that in the early years of the establishment of the new food body additional responsibilities for diet and nutrition are not transferred from Scottish Government or NHS Health Scotland.

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.

- It is widely recognised in Scotland that there should be a close relationship between nutrition research and policy and food labelling. Retaining these two functions within the new food body is sensible.

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.

- It is important that the new food body does retain access to and provides input to the existing advisory committees in the UK. It is also important that industry-led research is recognised as long as it is of good quality,

peer-reviewed and published.

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.

- While it is important that research and surveillance should have some Scottish slant it is also inevitable that most of the science and evidence programmes will have wider relevance to the UK. There are no areas of primary production that we are involved with in Scotland that do not have a wider UK relevance.

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.

- While it seems sensible that the new food body should be responsible for the coordination all Scottish Government funded research on food safety and nutrition we note that the current FSAS spend on research and surveillance is about £1.3 million per annum. Scottish Government invested £29 million in food and drink related research in 2012-13, along with £2.6 million by the Scottish Funding Council. It may be difficult for the new food body to take on responsibility for the coordination of all of this research.

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.

- No further comment.

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.

- We do not feel that further statutory powers are necessary (although see below).

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.

- As stated in para. 16 of this consultation “Official controls at other food and feed establishments, and at ports, are also delivered by local authorities.” It has been suggested that the new food body should share

or be delegated these powers of official control at ports and elsewhere. We would support this change.

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.

- We recognise that there is some merit in the new food body taking on regulatory policy or enforcement responsibilities for most of the areas referred to in para. 44. “Animal health” is a wide-ranging area, not all of it associated with food production, and “animal by-products” is another area that is not necessarily associated with future food production.

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.

- As previously stated we feel that there is merit in allowing “*the transfer of enforcement responsibility between local authorities and the new food body where both parties agree that official controls at a particular establishment or class of establishments, would be better delivered by one or other body according to local needs and circumstances*”.

As an example, we have hosted meetings with FSAS and local authorities to discuss the control and monitoring of “game larders” (a “*class of establishment*”) to try to ensure a proportionate and consistent approach across Scotland. We are still unsure whether this has been achieved, probably due to the fact that there is still uncertainty in some local authorities where responsibility lies.

Agreement and some transfer of responsibility between the new food body and local authorities would be helpful. We agree with others that it is important that any change delivers a more cost effective Meat Hygiene Service that still upholds high standards. We also agree that meat inspectors should have an extended role.

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.

- We do not feel qualified to comment on the proposed audit processes but recognise that a high level audit is required.

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.

- We would stress the importance of the new food body - FSA relationship

and hope that this would still allow Scotland to have a voice when negotiations are taking place at an EU level.

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?

- We support the continuation of engagement with “seldom heard” consumers through organisations engaged with these groups. For example, we were able to assist FSAS with research on those who consumed high levels of game meat. We would also support increased engagement with industry groups in general.

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.

- While we accept the suggested approach to ensure the new food body’s independence from Government and the food industry we also recognise that Ministers will retain some level of influence since, we assume, all Board positions will have to be approved by Ministers.

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.