

## 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?

- Comments It is considered that the scope of the new food body should allow for more active collaboration and co-operation with, and input from, agencies such as the Scottish Environment Protection Agency (SEPA) and Scottish Water (SW). We are aware of the close co-operation which exists in Shetland with the local authority's Environmental Health department and these agencies, for example; this cannot be said of the Scottish mainland. This is ably demonstrated at meetings of the Scottish Government's Shellfish Forum, (includes representatives from Government, Food Standards Agency Scotland, local authorities, public bodies and industry) particularly where issues surrounding water quality and pollution appear to be unable to be resolved.

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?

- Comments We agree with the arrangements detailed 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.

- Comments No further comment to make.

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.

- Comments Efforts should be made to ensure that the new food body is in a position to access the best available independent expert advice required to underpin its work in order that food safety and public health are not compromised. It is, however, important to ensure that no conflicts of interest are presented, particularly when advisors may also be recruited as contractors by the new food body, to deliver any regulatory testing regimes.

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.

- Comments No further comment to make.

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.

- Comments No further comment to make.

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.

- Comments No further comment to make.

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.

- Comments It is ironic that the recent horse meat scandal occurred, given the apparently robust regulatory regimes which currently prevail, not only in Scotland but across the EU and beyond. Consequently, it is important to ensure that any new food body is adequately resourced to address incidents such as these.

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.

- Comments It is considered that the new food body must ensure that the necessary resources are made available in order that it can deal effectively with contraventions of food standards and safety law.

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.

- Comments It is considered that the suggestions highlighted require much greater deliberation, not only with regard to resource and practicability etc. but also to ensure that current arrangements are not thwarted.

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.

- Comments The suggestions for change mooted are very significant and should not be considered lightly, not only from the point of view of resource, employment, practicability and cost. Centralising delivery of official food and feed controls would be a very retrograde measure: from past experience, it is considered that this is unlikely to prove successful. Extreme care must be taken not to jeopardise local environmental health services, and the local knowledge and experience which prevails. These bodies have provided and continue to provide successful delivery of services; this must be acknowledged and not overlooked or dismissed.

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.

- Comments It is considered that current arrangements in place in Scotland work well and should provide the basis for continued successful operation.

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.

- Comments It is considered that in addition to the organisations noted in paragraph 57, a way must be found for the new food body to have an active and meaningful working relationship with both SEPA and Scottish Water, given the respective roles of these agencies to protect and improve the environment and to supply safe drinking water and remove waste water.

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?

- Comments It is suggested that the current consultation methods highlighted would appear to suffice.

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.

- Comments It is considered that the suggested approach to ensure the new food body's independence from Government and food industry is adequate.

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?

- Comments No further comment to make.