

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 NHS Public Health Nutrition Group welcomes the fact that they have opportunity to comment and that the Scottish Government recognises that improving diet offers similar potential to improve public health as efforts to tackle smoking and alcohol and that this will be supported by legislation to create a new food body.
- The group contains representatives from each of the NHS territorial Boards across Scotland. The group meets quarterly to discuss common issues around public health nutrition and is chaired and hosted by NHS Health Scotland, though a distinct entity from NHS Health Scotland.
- The group welcomes stronger leadership on nutrition and the coordination of messaging in Scotland by the new food body as currently there is a fragmented approach to this.
- The group felt it was important to note current expertise with the FSA and other organisations working on public health nutrition and that not all organisations have similar fields of expertise. The existing technical and scientific expertise of the FSA in terms of nutrition and diet should be retained (and indeed enhanced) with an advisory role where appropriate.
- Some group members felt it would be beneficial for the new food body to focus on obesity and in particular the Obesity Route Map. It would be useful for the new food body to assess existing nutrition evidence/practice in this area and have a proactive role in guiding public opinion and emerging public health thinking on these issues.
- Another area that some members felt should be included was health inequality which is a key nutrition issue.
- Public knowledge, attitudes and skills around nutrition are complex and the new food body would need to align with work in these important policy areas.
- The work of the new food body would have to complement the work portfolios of other national organisations and Government Departments and a clear lead for each portfolio of work must be identified to ensure effective and efficient delivery. Also it would be of vital importance that relationships were maintained and that new ones established that will provide an overview of all the aspects of food work.
- Some members felt that in terms of the wider public health agenda that NHS Health Scotland already covers this role and that they saw no reason to change that but that the key role was to ensure that the new food body's specifically food focussed work should dovetail with that.
- It is important that the new food body is an organisation that is trusted by members of the public and provides consistent messages.
- The group would like the opportunity to comment further on the

extension of the scope of the new food body if suggestions are made on what areas this would include.

- If the responsibility would widen it would be important to consider the reasons as to why it is expanding and what the benefits as well as challenges would be.

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?

- The members felt it would be important that the new food body would remain independent and transparent for public confidence. Also it would be important to ensure clarity around who is responsible for what and that advice would be firmly evidence based.

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.

- The members felt that if the new food body's scope was to widen then it would be important to consider the rationale and impact for these changes.
- Some group members of the Public Health Nutrition Group felt that it would be important that the new food body had a role to play in relation to the Obesity Route Map.
- As well as decreasing the availability of products high in fat, salt and sugar and increasing awareness of obesity another important part of improving the diet of the Scottish population would be to increase the perceived value placed on eating good quality, healthy foods in population groups to raise consumer expectations and ensure consumers create a demand for this, to which industry and retailer will have to respond.
- The group agreed that if the scope of the new food body would widen it would be important to consider the reasons as to why it was expanding and what the benefits as well as challenges would be.
- If the new food body undertakes a consumer facing role then it would make sense for the healthyliving award and Community Food and Health (Scotland) to sit in within this organisation.
- It would be beneficial for the new organisation to make sure that evidence based consistent messages are promoted as well as dispelling myths.

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 currently a whole range of committees that the FSA currently utilise to advise them and it would be beneficial for the new food body to continue to use these sources of advice. However the group would advise against pulling together new Scottish only groups of the similar types as this would replicate and duplicate the work. Whilst the current population challenges for Scotland may differ slightly from those of the United Kingdom the scientific evidence is identical.

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.

- Scotland has specific issues in relation to poor diet and nutrition and if health inequalities are to be tackled successfully, there need to be a localised focus of research and surveillance on issues pertinent to Scotland and its population. However, learning from research and surveillance can be shared where appropriate so that it makes a contribution to the evidence base for the UK as a whole and that practice in Scotland can be influenced by external learning

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.

- Some members felt that the new food body should be responsible for the co-ordination of funded research on food safety and public health nutrition as this would ensure that research programmes are commissioned in a co-ordinated and complimentary way, whilst minimising duplication.
- Whilst other members felt that if all research activity was coordinated by one body then this potentially could overly restrict nutrition research.
- The new body could raise its profile as a research funder by establishing and strengthening links with the academic sector, both within and out with Scotland, to ensure a programme of research can be supported. This should be championed by Scottish Government. The profile could also be raised by clear communication channels with NHS Boards and Local Authorities so that local research development is in line with and complements nationally driven work.

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.

- The group felt that it is of great importance to ensure that commissioned research is independent from Government, industry and any other body where competing interests may arise. It is important to build trust, confidence and the reputation in the organisation. It is vital that the new

food body gains advice from the number of committees to gain a strong independent evidence base.

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.

- Not able to comment

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.

- Not able to comment

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.

- Not able to comment

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.

- Not able to comment

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.

- Not able to comment

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.

- Given the proposal that the new food body takes a wider public health approach to improving diet, nutrition and health, the group felt it should establish and make clear its working relationship with the territorial NHS Boards.
- The new food body may also wish to consider its relationship with the established national advisory groups such as the NHS Public Health Nutrition Group, which is currently hosted by NHS Health Scotland.
- Also enhancing relationships with the education system would be vital and involve a number of links with different agencies.

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?

- Some members felt that it is important that any work undertaken in relation to enhancing consumer information clearly compliments the work of NHS Health Scotland who has a role in increasing knowledge and public awareness of key health messages.
- The group felt that working in partnership with territorial NHS Boards and Local Authorities will assist the new food body in engaging effectively with consumers, as local staff and agencies (including the Third Sector) are working directly with target audiences.
- Some members felt that the 'consumer engagement' section doesn't provide detail of 'how' the consumers will be approached and involved. They felt it was a little vague and requires more direction. They thought that perhaps a developed process or pathway through which the consumer voice is heard and passed to relevant people would be beneficial.
- The group felt that when consulting with and providing information and advice to consumers, it must be presented in a format that is easily understood and accessible to all that it will affect. Particular thought should be given to the consultation, communication methods and format of materials used for hard to reach populations.

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.

- It is of vital importance that the new food body is viewed by the public as an organisation to trust and therefore be provided with clear and consistent messaging. It would be of vital importance for the organisation to have autonomy to act on scientific evidence independently from the political environment.

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?

- It should be clearly set out how the new food body will support and contribute to key agendas, such as, health inequalities, practical food/cooking skills and other programmes of work including Early Years Collaborative and older people.
- Some members felt it would also be of benefit for the new food body to have a lead role in driving a public health nutrition strategy for Scotland and presented a joined-up view of policy to improve food, nutrition and health so that professionals and the public alike are clear about the direction of travel including the approach to obesity prevention and management, achievement of Scottish dietary targets, food poverty and

inequalities, and food and environmental sustainability.

- It would be vital for the new food body to have an overview of all aspects of food and nutrition especially with the current policy framework sitting under different divisions within Scottish Government.