

## 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?

Yes, we believe the scope of the new food body should be extended beyond the current remit or responsibilities. **We welcome the statement in the consultation document that the new agency will support the Scottish Government's objectives by 'contributing to tackling inequalities through involvement in addressing food poverty.'** As the consultation acknowledges, Scotland continues to face significant problems in relation to health inequalities and health related problems experienced by households affected by poverty. To effectively tackle these inequalities there needs to be greater coordination of efforts from Scottish Government, its agencies, the wider public sector and indeed the private sector. By clearly stating the role that the new food agency will have in relation to tackling inequalities it will be possible to ensure that activities to help deliver this objective are contained within the plans of the agency, and that it can be held to account on these issues.

### Food poverty

One expansion of the responsibilities of the new food body would be to provide research and information on food poverty. There is a need for greater evidence and information on the impacts and experiences of food poverty within Scotland.

This is particularly important as the current context where the impact of welfare changes and the rising cost of basic good has seen an increasing number of people make use of food banks. The Scottish Government has not, as far as we understand, considered the impact of this development on diet, long-term health, access to quality food in any comprehensive way. By giving the responsibility to the new agency to monitor and track issues around food poverty in Scotland it would enable the Scottish Government, Health Board and Local Authorities to take adopt a more strategic response.

Recent evidence on food poverty points to a growing problem across the UK. This reflects evidence of a growing concern about food prices for low-income groups across the UK. An analysis of food prices conducted by Department of Environment, Food and Rural Affairs (DEFRA) 2012 showed that food prices had risen 12% in real terms over the last five years.<sup>1</sup> This rise has impacted more on low-income families as they spend a higher proportion of their income on food.<sup>2</sup> Evidence from the Trussel Trust

<sup>1</sup> Department for Environment , Food and Rural Affairs ( 2012) 'Food Statistics Pocketbook' page 25  
<http://www.defra.gov.uk/statistics/files/defra-stats-foodfarm-food-pocketbook-2012-121005.pdf>

<sup>2</sup> ibid

indicates that food banks are opening at a rate of around 3 a week and the number of people fed by food banks has doubled to almost 130'000 over the last year alone<sup>3</sup>. The Poverty and Social Exclusion Survey 2012 indicated that almost 1-20 households in Scotland are unable to afford an adequate diet. In addition in all of the Scottish households where children lack a basic food item, at least one adult reported that they skimped on their own food so that others could have enough. In addition currently estimates conducted by the Institute of Fiscal Studies indicate that poverty continues to be a growing problem with an increase in households experiencing poverty expected over the coming years.

We would recommend that the new food agency extends its scope in order to cover issues of food poverty, particularly in relation to monitoring and providing evidence on the extent of food poverty. This monitoring role would include assessing the implications of the growth in the use of food banks in Scotland.

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?

We believe that the arrangements set out in Annex A require to be revised. As they stand, they do not reflect the clear role that the the Scottish Government intends the new agency to have in relation to health inequalities. Whilst it is correct that the responsibility for this area must be lead by the Scottish Government and Health Scotland, we believe that health inequalities issues should be more clearly stated in the responsibilities of the new agency. For example, in points 4 and 5 in the Annex, it would be possible to include specific references to health inequalities and food. This would ensure that that this issue was not lost by the new agency when producing evidence, advice and information on more general issues.

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.

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.

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<sup>3</sup> Trussell Trust (2012) 'Emergency food for UK's people in Crisis'  
[http://www.trusselltrust.org/resources/documents/Press/General\\_Foodbank\\_Appeal2012\\_NORDO.pdf](http://www.trusselltrust.org/resources/documents/Press/General_Foodbank_Appeal2012_NORDO.pdf)

- Comments

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.

No comment

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.

- No Comment

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 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.

- No 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.

- No 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.

The consultation makes relatively little mention of the environment aspects of food production, distribution or consumption. Another key area the body could promote is a more sustainable approach to food production and food access. Within Scotland many disadvantaged communities have improved access to affordable food through community based food projects where people are growing and consuming locally and illustrating other benefits to the wider environment such as reduced carbon foot prints.

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.

- No 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.

- No 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.

The new agency should ensure that it makes strong links with those in the voluntary sector that have an interest in issues around food, diet, community health and wider poverty and inequality issues. There are a number of key bodies within the voluntary sector that should be seen as key stakeholders such as Voluntary Health Scotland, Community Health Exchange, Community Food and Health Scotland. The new agency should ensure that effective relationships are established and maintained with these bodies and others in the 3<sup>rd</sup> sector.

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?

Establishing panels is one effective way of engaging with consumers. We would welcome approaches that maintain on-going engagement with consumers, and that this engagement is not seen as an afterthought. Too often consumer engagement begins when policy or practice options have already been essentially agreed.

We would also welcome approaches that ensure that low-income consumers are actively engaged in the work of the agency. This may mean working through trusted third party organisations such as the Poverty Alliance. The new agency should also explore innovative ways to both engage with low income consumers and generate relevant evidence, for example through the use of participatory research methods.

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.

- No Comment

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