

## 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 SCA agrees that the new food body should extend beyond the current scope and that food safety should not be divorced from nutrition and labelling and standards. The SCA do not see the merit or need for the new food body to undertake responsibility for the consumption of, and the health issues associated with, alcoholic beverages.

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 SCA agrees that the respective roles of the Food Standards Agency (FSA) and the Scottish Government should remain independent in relation to health improvement and nutrition, taking account of both food and wider health 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.

- Comments

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.

The SCA believes that if the new food body are to be successful in their aims and objectives that it is a must that access to independent scientific advice is made available.

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's universities remain committed to research and building on a legacy of innovation that has produced the television, telephone, penicillin, Radar, antiseptic and anaesthetic. The list is long and it keeps on growing.

Today Scotland leads the world in industrial innovation. Many major

international companies have operations here, recognising our cutting-edge research techniques and commitment to developing new products and

services. University of Glasgow research painted a poor picture of our nation's health. shows that around two-thirds of the Scottish population is overweight or obese, a similar proportion are not sufficiently physically active, and most people have a poor diet – it is just that it is not the same majority for each factor. However, research into the health and wellbeing of others is of significant importance and therefore the SCA suggest that the new food body should contribute to science and evidence programmes on wider issues which have relevance to the UK as a whole.

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.

The SCA agrees that the new food body should be responsible for the coordination of all Scottish Government funded research on food safety and public health nutrition.

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 Comments

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.

It is the understanding of the SCA that the FSA (UK) had recently 'ordered' food companies to undertake DNA testing of their beef products. However, testing by retailers and manufacturers is currently voluntary as the FSA does not have the powers to legally require testing.

The SCA agrees that New primary legislative powers to enable the detention and sampling (DNA testing) of any food, where there are reasonable grounds to suspect that it does not meet the requirements of food law in relation to food standards or labelling, similar to those which already exist for foods not complying with food safety legislation are required.

The SCA would feel uncomfortable commenting on an new legislation aimed at "naming and shaming" following the outcome of an official food

## inspection

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.

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 SCA recognises the appeal for inclusive management of the roles and responsibilities currently not fulfilled by the FSA in Scotland. However we would question the ability of the new food body to apply effective and proportionate **controls** throughout the food chain in relation to the work of the Animal Health and Veterinary Laboratories Agency Divisional Offices or indeed the Scottish Government Agriculture, Food and Rural Communities Directorate (Animal Health and Welfare). The SCA would need to review additional evidence and or measures before making a conclusive statement.

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.

The SCA has concerns that the delivery of all official food and feed controls falling directly to the new food body could jeopardise the current holistic nature of environmental health services, which also cover aspects of control, monitoring and advice in relation to infectious disease, pollution, environmental noise and occupational health and safety.

The SCA suggest that the new food body could, in certain circumstances take on direct responsibility only for official controls and functions currently delivered by local authorities. Transfer of enforcement responsibility could be possible 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.

The SCA has particular concern over the new food body's ability to consistently and safely enforce areas within the localised traditional and wild game meat establishments.

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.

Controls for the approval, the suspension or withdrawal of approval should remain with local authorities. Responsibility for enforcement action relating to operation of an unapproved establishment requiring approval should rest within the new food body.

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.

No additional suggestions

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?

The public cost of dealing with obesity is set to rise to £3 billion by 2030. The necessity to fund an effective short, medium and long term information and advice service based on sound research and policy will far out way the continued spiralling cost of dealing with obesity and other food related disorders. Food is one of the fundamentals of life, everybody eats! Education from a very early age sets the foundation for the adults of tomorrow. An education programme and more over a sound schools and hospital menu will go a long way to contributing to the nations on-going health.

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.

The SCA agrees that the new food body should retain an arm's length relationship with the Scottish Government and the 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?

No further comments