

## 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 Scottish Directors' of Public Health (SDsPH) welcomes the creation of a New Food Body for Scotland, building on the current strengths, achievements and guiding principles of the existing Food Standards Agency in Scotland (FSAS).

We are pleased with the consultation's assurances that the New Food Body will be independent from both Government and the Food Industry, and will continue to safeguard Scotland's health by building on the excellent work of FSAS in the areas of scientific expertise, food safety, hygiene, inspection and regulation.

The SDsPH agrees that it is timely to clarify the future roles, responsibilities and leadership for food and health in Scotland. We agree that such agreements should be done formally and reviewed regularly. As a result, we hope to build strong relationships with the New Food Body, ensuring the most efficient and effective use of public resource as well as maximising the shared impact of our work.

In terms of the New Food Body's potential scope, the SDsPH are mindful of the important role which NHS Health Scotland has carried forward in this area over the years. So, whilst welcoming the opportunity to think about new ways of working in this area, the SDsPH would wish to ensure that any structural or functional reorganisation has the effect of increasing the efficiency and effectiveness of delivering public health outcomes relating to food and human nutrition. This would be especially so in the context of ensuring that any New Food Body or rearrangement of existing functions makes an effective contribution to health improvement and reducing health inequalities.

As a result the SDsPH consider that the idea of a single national public health agency for Scotland in relation to food and diet is worthy of further exploration. However, at present the responsibility for a range of public health functions is spread across a number of agencies at both national and local level. Whilst the integration of this effort maybe desirable, it would be a major undertaking to review the situation, analyse current gaps or duplication of effort, and propose cost effective options for implementation. In a time when functional rather than structural review is being explored as a means of achieving integration, the SDsPH would recommend that any proposal arising from this review focus on functional change rather than structural change in relation to the existing national and local public health agencies.

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 SDsPH would wish to build on the current arrangements for independent and partnership work on diet and nutrition. The continuation of the Scottish Government-led Food and Health Delivery Forum seems critical to this process, ensuring the on-going strategic planning and co-ordination of food policy and practice development between all key players, including NHS Health Scotland and the New Food Body for 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.

The SDsPH recognises the major strengths of the current Food Standards Agency in Scotland (FSAS) in terms of its scientific expertise; its leadership on the food and nutritional aspects of public health. Widening the scope into the areas currently the role or responsibility of may have its attractions, but would need to be based on a sound business case that showed economic and governance benefits and maximised expected positive public health impacts.

In all these debates, the SDsPH are aware of the points raised by NHS Health Scotland and would endorse these as their own.

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 SDsPH would expect that New Food Body should be able to access expert advice on public health nutrition in addition to expert advice in the areas of public health improvement, health inequality reduction and health protection.

Equally, the SDsPH may expect to also provide such advice to the New Food Body where appropriate.

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.

The SDsPH share the view with NHS Health Scotland that the New Food

Body should focus its research and surveillance activities on issues that are pertinent to the health and wellbeing of Scottish citizens first and foremost, but also having the scope to contribute to science and evidence programmes on wider issues, which have relevance to the UK as a whole.

Indeed, there are areas of dietary research, particularly in relation to the food chain, where an international focus for the agency would also be valuable to Scotland, such as being part of the recently drafted WHO European Action Plan for Food and Nutrition. However, the correct balance needs to be struck to ensure that the new body's main priority is addressing Scottish needs and issues, especially the continued surveillance of the Scottish diet across the whole life course. This learning, however, can feed into wider work where capacity allows.

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 SDsPH does not have a strong view on this matter, save to note that if this proposal is taken forward, there would be a need to undertake a separate consultation to establish a better balance in the food and nutrition related research that is focussed on achieving public health outcomes.

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 SDsPH notes that close partnership with public and academic sectors, building on existing expertise, will be critical to establishing 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.

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 SDsPH consider that there is the potential for a greater role that could be played by the New Food Body in addressing the need for a more sustainable and secure food system for Scotland.

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 SDsPH consider that the New Food Body will need to maintain effective relationships with Health Protection Scotland, NHS Health Scotland and individual NHS Boards to achieve its full potential in contributing to public health outcomes for Scotland's people.

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 SDsPH welcomes the commitment of the New Food Body to developing a strong consumer focus. However, we are also aware of the excellent work which NHS Health Scotland and Community Food and Health (Scotland) (which now is part of NHS Health Scotland) in this area. There will be need for the New Food Body to learn from these agencies.

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 SDsPH consider that it is essential for the New Food Body's to maintain its independence in this complex area where there are some major conflicting interests. The Scottish Government is to be commended in seeking to uphold this important principle.

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 comment.