



A Healthier Scotland: Consultation on Creating a New Food Body

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QUESTION 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?

We can see no reason why the new FB should extend its scope beyond that of the current FSAS, unless there is a gap that needs to be filled with the dissolution of FSA in the rest of the UK and potential changes to the constitutional situation in Scotland (i.e. increased devolution of powers or independence). In fact, there are some cogent arguments to support reducing the remit of the new FB to rationalise and streamline its roles and responsibilities e.g. the removal of advice on food, diet and health to other bodies such as the NHS. Indeed the latter are already fulfilling this role: <http://www.nhs.uk/livewell/goodfood/Pages/Goodfoodhome.aspx>

QUESTION 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 largely agree that the new FB and the Scottish Government should continue the existing arrangements. However, diet and nutrition policy is a very large area, encompassing a range of different issues, from basic gut biology, to (probably more importantly in Scotland) social issues relating to: physical exercise and fitness, education, poverty, ignorance, apathy, social status and location. Consequently, multiple areas of expertise would be required to tackle this issue such as NHS, social scientists, economists etc, working together where each area overlaps. A priori, there would seem to be little overlap with food safety and related legislation, therefore it may even be better to consider an entirely new department of health and well-being which looks at improving the overall health of the Scottish population. This would encompass the relationship between food, diet and obesity and related problems, but could also pick up on other health-related problems of particular interest to Scotland such as heart disease, liver disease (including alcohol

abuse), drug misuse, and some generic problems such as age related health and wellbeing.

Food should not be considered in isolation from where and how it is produced – there is a continuum from farm to plate, therefore the complete food-chain needs to be considered as a whole, not in separate sections. The current FSA follows this approach and it is fundamental to food safety and quality that the same approach is maintained. It should be possible for the new body to co-ordinate its efforts with agri-food research at one end of the spectrum and public health at the other.

It is crucial that the new FB seek out relevant strategic partnerships as its budget will surely not allow it function effectively in a vacuum. However if the new FB is to be responsible for all that is indicated, it is difficult to see how such a controlling and overarching body could;

- have sufficient budget to do these functions effectively and
- be at arm's length from government (who would have overall control through budgeting).

QUESTION 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.

We can see no persuading argument that the new FB should take on any additional roles, responsibilities and functions in the area of diet and nutrition. In fact, as suggested above, there may be an argument that the new FB should relinquish some of its previously held role in disseminating advice on health and diets to other bodies such as the NHS (<http://www.nhs.uk/livewell/goodfood/Pages/Goodfoodhome.aspx>). One of the key priorities here is co-operation and co-ordination with other bodies to (i) ensure the best solutions for Scottish health and (ii) avoid any duplication in effort or resources.

QUESTION 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 establishment of the new FB represents an excellent opportunity to re-examine its relationship with its experts. The new FB should seek to work in partnership with the excellent science base in Scotland but also make full use of the sound advice and expertise available in the UK, Europe and the rest of the world to avoid replication of effort and exploit synergy in approaches.

The new FB could review its procedures in this area and build more concrete links with other groups, such as RCUK through targeted calls, in the same way that RESAS partners with BBSRC on priorities such as Food Security and Living with Environmental Change (LWEC). It is important that any partnership does not replace any of the current funding (either FSAS or RCUK independent calls & tenders), but instead would allow for a combined effort in a particular area. A good example is the current *E. coli* supershedders call from the FSA, which may well be constrained in scope by the available funds. If it was combined with Defra/BBSRC/ NERC calls (depending on which aspect was being investigated), then this would allow for a more extensive analysis of the issues, still with the idea that the results can be applied in a practical way. In short, this approach provides sensible and targeted allocation of money to enable better answers whilst keeping the questions in-line with current or future FB strategy.

It may also be timely to generate and use a list of expertise-providers (such as those used by other agencies e.g. EFSA or the SGM). The new FB could seek to set up a network of institutions or bodies with “expert status” that they can turn to as a “first-stop” advisory role. The new FB has an opportunity to define the science base and evidence providers and re-engage with the wider community to rediscover their appropriate science scene. Research tenders can still be open to all, but the experts can be relied on to give un-biased, expert advice based on scientific evidence and therefore provide confidence for the body, the government and the taxpayer.

QUESTION 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.

In a way it is essential that new Scottish FB should give greater weight to problems that are more prevalent or specific to Scotland as other bodies will not. However, few issues are unique to Scotland and much can be learned through examination of wider problems. The new FB should seek to continue to learn from existing evidence, best practice and/or procedures no matter where it arises from if it is relevant to problems prevalent in Scotland. This is also cognate with the aforementioned suggestion of seeking the best partnerships (perhaps outside Scotland) and funding mechanisms to obtain the best and most appropriate return for investment of funds.

However, it is possible to do both. Some Scottish-specific problems will require priority (e.g. *E. coli* O157:H7 prevalence / shellfish), but that work should still absolutely be carried out in the context of the UK national or even an international scale. It would be seem logical to work out the “*what and why*” is happening in Scotland first, and then discover if and how it is different from elsewhere. This is important because it is very unlikely that any scenario is unique to Scotland but rather it represents one part of a spectrum but with, perhaps, localised unique aspects. Therefore, it is possible to transfer knowledge from elsewhere to Scotland and vice versa. It is also important to

be able to accurately inform other countries of the issues in Scotland relating to food primarily because of international trade. In essence the body should aspire to be international in its operation but to deliver local and national solutions.

QUESTION 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.

There does not appear to be any evidence that additional benefits would accrue from placing the co-ordination of all Scottish Government funded research on food safety and public health nutrition with the new FB. For example, the RESAS-funded Strategic Research Programme (<http://www.scotland.gov.uk/Topics/Research/About/EBAR/StrategicResearch/future-research-strategy>) has provided excellent policy-relevant answers and internationally-recognised high impact research through interactions with an already established network of valued and inter-linked research-providers. It is our opinion that making the new FB an overarching controller of this effort seems superfluous and rather over-managed.

The RESAS funded Portfolio has generated knowledge and science that has led to significant successful interactions with industrial partners which could be jeopardised by addition of another layer of administration. For example the collaborations between scientists on the generation of acrylamide accompanying the high temperature cooking of cereals and potatoes is progressing well without (S)FSA intervention. Furthermore industrial collaborations at the EU level have seen risk assessment strategies developed for novel foods in projects such as SAFEFOODS and NOFORISK. It is not clear how such research, that benefits both industry and ultimately consumers, could be carried out under the auspices of the new FB with its all-encompassing remit.

In addition, it is not clear how the new FB could be both at arms-length (or independent) from government as in FSA-S, but also be co-ordinating all research bodies currently listed as Scottish-Government funded. It seems more sensible for new FB to integrate their efforts and co-operate with other existing bodies.

There seems little reason for the new FB to raise its profile as a matter of priority. Most stakeholders and customers (e.g. industry and the public) will rapidly understand that the new FB is expected to take on the same responsibilities and functions as the existing SFSA. A better idea would be for the new FB to re-discover its role, rescan the horizons and re-negotiate its place amongst the research, regulatory, advisory and engagement bases that it needs to nurture and exploit.

QUESTION 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.

Many of the comments made in response to question 4 are also valid here. The new FB represents an opportunity to understand what advice is already available, what research is already being done, and to refocus priorities for research but with sufficient flexibility to exploit new wider opportunities and perhaps set up network of preferred advisors. It would also seem apposite to take every opportunity to reinvigorate the engagement and knowledge transfer mechanisms to ensure consistency between advice providers and that the advice given is actually taken up and used.

As noted above, splitting diet and nutritional advice away into a separate health and wellbeing body would allow the new body to focus on food safety and food standards.

Of course, whatever format the new FB takes, its budget will define its function. There was certainly added value of FSA-S working along with FSA-UK and there must be questions about the maintenance of this relationship and the ability of an independent new FB to access FSA-UK knowledge/expertise/advisory information.

QUESTION 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.

We have no specific comments to make on this question.

QUESTION 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.

We have no specific comments to make on this question.

QUESTION 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.

We have already commented on this area in response to questions 1 and 6. There seems no good reason for an extension in roles and responsibilities.

QUESTION 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.

We have no specific comments to make on this question.

QUESTION 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.

We have no specific comments to make on this question.

QUESTION 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.

We have outlined ideas in our responses to previous questions but also in question 14. We would reiterate however that much of what the NHS is doing already, at least for the public, is delivering on this: <http://www.nhs.uk/livewell/goodfood/Pages/Goodfoodhome.aspx>

QUESTION 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?

This largely depends on their focus. As mentioned earlier diet and health advice is, confusingly, being provided by both SFSA and NHS. Who does the consumer trust and who should they go to? The division of labour whereby diet and health remains the priority of NHS and food safety and standards that of the new FB would massively clarify this and leads to savings in terms of effort and resources.

Regardless of their eventual remit the new FB should strive to make itself the first point of contact for Scottish consumers seeking advice. Furthermore, the new FB could interact more with the appropriate ministers (Education and Life Long Learning; Health and Wellbeing; Public Health; Rural Affairs and the Environment; Finance, Employment and Sustainable Growth etc), educationalists and appropriate stakeholders (e.g. Scotland Food and Drink, Scottish Food and Drink Federation) to ensure that their crucial messages reach the corresponding audiences. However, this does not mean that the FB should compete with existing trusted advice givers (such as the NHS) rather that they should perhaps share common web destinations or common portals to health advice with other organisations.

QUESTION 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 "*at arm's length*" status of the new FB would seem essential to prevent accusations of political bias or interference from food industries. The new FB should be set up in this fashion. The new FB would obviously be independent from the food industry but more emphasis should be made to engage with industries. Indeed the adoption of a 360° approach to their remit is advisable

as this facilitates the auctioning of their regulatory and legislative activities whilst being responsive to emergent and long term industrial problems such as the replacement or specific elimination of food ingredients, food nutritional profiling and the problems of insufficient or too much information on food labels.

This approach would ensure that every effort is made to encourage food industries to reap the commercial rewards of re-formulating their products to make healthier formats and make a contribution to a healthier Scotland.

QUESTION 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?

We have no specific comments to make on this question.