## CONSULTATION QUESTIONS

1. How important do you think it is that we aim to be a Good Food Nation?

SFAC’s key function is to advise on food safety and standards in Scotland. It does therefore not take a specific view on issues which are wider than this. However, undoubtedly the progress made in recent years under “Recipe for Success” is substantial and the Committee very much supports building on that progress. SFAC sees as crucial in this, embedding in the food sector best (“world class”) practice in food safety, food standards and food authenticity. Without such embedding there is the serious danger that progress could be undermined – as we have seen with high profile food scares in the past.

2. How would we know when we had got there? What would success look like?

In principle success would be assessed in terms of a range of high profile indicators. Following paragraph 3 above reliable indicators of food safety, standards and authenticity are essential components. There needs to be a zero tolerance approach to failures in these areas – irrespective of the implications for individual businesses. For the vision to be successful it is necessary for reputation in these key areas to grow and not be lost by poor implementation or complacency. In short the bedrock work of FSS will be crucial to the success of this endeavour.

3. Do you agree with the proposed vision? How would you improve it?

The vision is much wider than the scope of SFAC, so the Committee offers no comment on the scope. That said, the Committee supports the elements that lie within its remit. One issue which the Committee feels will need careful handling relates to health, diet and nutrition. The Committee’s views are detailed in paragraphs 8-10 of this response – in relation to the Food Commission.

4. How would your life be better? What does being a Good Food Nation mean in your locality?

Not applicable.
5. Are there any other essential steps we need to take before setting out on this journey?

In SFAC’s view the main steps are identified in the relevant text on pages 19 and 20. One issue that is crucial, however, is to ensure that not only policy intention and measurement indicators are set out but that implementation is robust and assured. (“World class” has demonstrably to mean world class – not a tick box exercise.)

6. How do you think a Food Commission could best help?

1. This is the proposal which SFAC considered in most detail. Two key issues were identified. First, currently SFAC believes that there are already too many public bodies involved in diet and nutrition in Scotland and that the inevitable plethora of initiatives is blunting progress in tackling fundamental problems like obesity. So the important prior question is to be clear about where (public body) responsibilities lie in this area - and more specifically the exact role of FSS in future. (SFAC have produced a short “advice” paper on this issue which seeks to identify the key points for decision – now made available to the SG.) The question then is to determine what functions the Food Commission might have, having addressed the issue of division of responsibilities. SFAC sees it as unhelpful to add another “healthy eating” voice. It is not that the issue is unimportant – it is very important – but the key is avoiding too many bodies with overlapping agendas thereby blunting messages.

2. The second concern relates to the independence of FSS. The implication of the consultation paper is that FSS will be involved with the work of the Food Commission and in some sense be associated with the conclusions it reaches and the advice it offers. Assuming that FSS is being set up as an independent voice speaking out on food safety and standards matters for the consumer based on scientific evidence – as the draft legislation implies - the SFAC view is that it must not be bound by advice which is influenced by interests other than those of consumers. While it will be the case that in some, possibly many, instances the interests of consumers will be consistent with the interests of the food industry, these two interests are not identical and may diverge. Where FSS believes that it needs to speak out in the consumer interest even where it looks as though it is against the industry interest it must be able to do so. In many ways of course this is a major strength in building the kind of overall vision set out in the consultation document; that vision will be infinitely stronger if it receives the independent support of a body whose sole interest is consumers.

3. SFAC believes that in setting up the Food Commission some careful thinking is required in setting its remit to ensure that these two issues are addressed.
7. In what areas should indicators be set to check we are on track towards our goals?

In SFAC’s view, indicators of food safety, food standards and food authenticity are essential.

8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?

SFAC agrees with the two bullet points under the “Consensus” heading on page 20 of the document. In addition to that, however, the Committee believes that having much greater clarity on who is responsible for what on diet and nutrition – as noted in previous responses above – is also crucial to avoiding further false starts.

9. Do you agree with the proposed initial focus on:
   - Food in the public sector
   - A children’s food policy
   - Local food
   - Good food choices and
   - Continued economic growth?

Yes. The Committee believes that in terms of the future work of FSS, segmenting the Scottish population and ensuring both that the views of the different segments are heard and relevant messages are conveyed to them – in taking forward the food safety, standards, authenticity (and possibly diet and nutrition?) agenda.

10. Which other areas would you prioritise?

In time – further segments of the population, notably, for example, older people, but also those who are housebound, hard to reach etc.

11. What other steps toward achieving a Good Food Nation would you recommend?

SFAC believes that coordination is crucial amongst the various bodies with an interest. But good coordination is built upon being clear – at the start – as to who is responsible for what particularly in terms of public bodies. Hence a crucial starting point is this clarity.
12. What else should be considered?

Nothing further beyond the suggestions above.

13. What steps do you plan to take to help Scotland on the journey toward becoming a Good Food Nation – in the next month and in the next 12 months?

In view of the background noted above, SFAC will have no role beyond March 2015. That said the Committee are interested to ensure a strong and focused FSS on food safety, food standards, food authenticity and possibly diet and nutrition. The Committee believes that these are essential bedrock issues in building towards a Good Food Nation.

14. How did you hear about this Discussion Document?

Jim Wildgoose, Chair of SFAC was invited to the consultation launch
Richard Lochhead MSP
Cabinet Secretary for Rural Affairs and the Environment
St Andrews House
Regent Road
Edinburgh
EH1 3DG

17th October 2014

Dear Mr Lochhead

Becoming a Good Food Nation: Response from the Scottish Food Advisory Committee (SFAC)

Following Tim Bennett’s letter of 13 October to you, I now attach the more detailed response to the consultation on “Becoming a Good Food Nation” from SFAC – as promised in that letter.

SFAC very much welcomes this initiative – and indeed the progress made already under “Recipe for Success”. Our main comments in the response reflect the need to ensure continuing excellence in safety and standards in Scottish food and, in the case of responsibilities on diet and nutrition, to suggest the need for a clear delineation of responsibilities between public bodies in this area.

The SFAC response has gone to the e-mail address in the consultation document.

Copies of this letter go to the Minister for Public Health, Michael Matheson MSP, Tim Bennett and SFAC members.

Yours sincerely

J. Wildgoose
Chair, Scottish Food Advisory Committee

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Scottish Food Advisory Committee response to “Becoming a Good Food Nation”

1. This note provides a response from the Scottish Food Advisory Committee (SFAC) to the Scottish Government consultation document “Becoming a Good Food Nation”. SFAC is the channel through which currently Scottish views on all food safety and standards policy issues are conveyed to the Food Standards Agency Board such that decisions take account of Scottish interests. These arrangements will cease following the setting up of a new body in Scotland – Food Standards Scotland (FSS) – expected from April 2015. SFAC will not therefore be involved in the implementation of the proposals in the consultation document. However, the Committee is keen to see the success of this initiative and offers comments in an effort to assist this endeavour. SFAC has also produced various “advice” notes in relation to key areas in the setting up of FSS and to some extent these link to the views expressed here. These advice notes have now been sent to the SG.

2. The response briefly responds to the questions posed in the consultation document, to the extent relevant to SFAC, given the above background.

How important do you think it is that we aim to be a Good Food Nation?

3. SFAC’s key function is to advise on food safety and standards in Scotland. It does therefore not take a specific view on issues which are wider than this. However, undoubtedly the progress made in recent years under “Recipe for Success” is substantial and the Committee very much supports building on that progress. SFAC sees as crucial in this, embedding in the food sector best (“world class”) practice in food safety, food standards and food authenticity. Without such embedding there is the serious danger that progress could be undermined – as we have seen with high profile food scares in the past.

How would we know when we had got there? What would success look like?

4. In principle success would be assessed in terms of a range of high profile indicators. Following paragraph 3 above reliable indicators of food safety, standards and authenticity are essential components. There needs to be a zero tolerance approach to failures in these areas – irrespective of the implications for individual businesses. For the vision to be successful it is necessary for reputation in these key areas to grow and not be lost by poor implementation or complacency. In short the bedrock work of FSS will be crucial to the success of this endeavour.

Do you agree with the proposed vision? How would you improve it?

5. The vision is much wider than the scope of SFAC, so the Committee offers no comment on the scope. That said, the Committee supports the elements that lie within its remit. One issue which the Committee feels will need careful handling relates to health, diet and nutrition. The Committee’s views are
detailed in paragraphs 8-10 of this response – in relation to the Food Commission.

**How would your life be better? What does being a Good Food Nation mean in your locality?**

6. Not applicable.

**Are there any other essential steps we need to take before setting out on this journey?**

7. In SFAC’s view the main steps are identified in the relevant text on pages 19 and 20. One issue that is crucial, however, is to ensure that not only policy intention and measurement indicators are set out but that implementation is robust and assured. (“World class” has demonstrably to mean world class – not a tick box exercise.)

**How do you think a Food Commission could best help?**

8. This is the proposal which SFAC considered in most detail. Two key issues were identified. First, currently SFAC believes that there are already too many public bodies involved in diet and nutrition in Scotland and that the inevitable plethora of initiatives is blunting progress in tackling fundamental problems like obesity. So the important prior question is to be clear about where (public body) responsibilities lie in this area - and more specifically the exact role of FSS in future. (SFAC have produced a short “advice” paper on this issue which seeks to identify the key points for decision – now made available to the SG.) The question then is to determine what functions the Food Commission might have, having addressed the issue of division of responsibilities. SFAC sees it as unhelpful to add another “healthy eating” voice. It is not that the issue is unimportant – it is very important – but the key is avoiding too many bodies with overlapping agendas thereby blunting messages.

9. The second concern relates to the independence of FSS. The implication of the consultation paper is that FSS will be involved with the work of the Food Commission and in some sense be associated with the conclusions it reaches and the advice it offers. Assuming that FSS is being set up as an independent voice speaking out on food safety and standards matters for the consumer based on scientific evidence – as the draft legislation implies - the SFAC view is that it must not be bound by advice which is influenced by interests other than those of consumers. While it will be the case that in some, possibly many, instances the interests of consumers will be consistent with the interests of the food industry, these two interests are not identical and may diverge. Where FSS believes that it needs to speak out in the consumer interest even where it looks as though it is against the industry interest it must be able to do so. In many ways of course this is a major strength in building the kind of overall vision set out in the consultation document; that vision will be infinitely stronger if it receives the independent support of a body whose sole interest is consumers.
10. SFAC believes that in setting up the Food Commission some careful thinking is required in setting its remit to ensure that these two issues are addressed.

**In what areas should indicators be set to check we are on track towards our goals?**

11. In SFAC’s view, indicators of food safety, food standards and food authenticity are essential.

**What are your views on the different approaches that could be taken to help us become a Good Food Nation?**

12. SFAC agrees with the two bullet points under the “Consensus” heading on page 20 of the document. In addition to that, however, the Committee believes that having much greater clarity on who is responsible for what on diet and nutrition – as noted in previous responses above – is also crucial to avoiding further false starts.

**Do you agree with the proposed initial focus on:**

- Food in the public sector
- A children’s food policy
- Local food
- Good food choices and
- Continued economic growth?

13. Yes. The Committee believes that in terms of the future work of FSS, segmenting the Scottish population and ensuring both that the views of the different segments are heard and relevant messages are conveyed to them – in taking forward the food safety, standards, authenticity (and possibly diet and nutrition?) agenda.

**Which other areas would you prioritise?**

14. In time – further segments of the population, notably, for example, older people, but also those who are housebound, hard to reach etc.

**What other steps toward achieving a Good Food Nation would you recommend?**

15. SFAC believes that coordination is crucial amongst the various bodies with an interest. But good coordination is built upon being clear – at the start – as to who is responsible for what particularly in terms of public bodies. Hence a crucial starting point is this clarity.

**What else should be considered?**

16. Nothing further beyond the suggestions above.
What steps do you plan to take to help Scotland on the journey toward becoming a Good Food Nation – in the next month and in the next 12 months?

17. In view of the background noted above, SFAC will have no role beyond March 2015. That said the Committee are interested to ensure a strong and focused FSS on food safety, food standards, food authenticity and possibly diet and nutrition. The Committee believes that these are essential bedrock issues in building towards a Good Food Nation.

SFAC

October, 2014.