CONSULTATION QUESTIONS

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

The Royal Environmental Health Institute of Scotland (REHIS) supports the philosophy of Scotland becoming a Good Food Nation. There is significant public health concern about the direct impact that diet choices and food availability has on individual and population health. Scotland has a poor dietary record with more people being diagnosed annually as clinically obese than ever before coupled with significant societal and cultural challenges around food availability and sustainability. Therefore, we believe that it is very important that Scotland embraces these challenges and moves forward in a positive and collaborative way as described within the consultation document.

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

There is currently a raft of different health related outcomes and indicators that should be reviewed to determine where any gaps exist, particularly in relation to obesity and diet related illness. Once these indicators are determined, these can be used and improved to demonstrate and measure progress towards becoming a Good Food Nation. For example, clinical indicators could measure referral or “time to be seen” time of patients with diet related health concerns being seen by dietetic services or other clinical specialists. Social indicators such as the number of people accessing food banks or other charitable advocacy services relating to food should also be considered.

Education underpins the philosophy of the ‘Good Food Nation’ consultation, particularly of school age children. REHIS continues to lead on a national food hygiene training initiative for secondary schools in Scotland. Through funding by the Food Standards Agency (FSA), the Institute provides all course materials, exam papers and certificates for both the REHIS Elementary Food Hygiene Course and the REHIS Introduction to Food Hygiene Course. The schools are approved by REHIS to deliver the Elementary and Introductory Food Hygiene Course to pupils aged 13-18 years inclusive. Each year, approximately 15,000 pupils participate in this initiative to gain a nationally recognised REHIS qualification. The knowledge and skills learned are not only valuable personally to the pupil, but can have a direct positive impact on family and social life as well as industry. With the transition to Food Standards Scotland (FSS), the Institute advocates the continuation of this vital programme of work which directly complements the aims and ambitions of the Scottish Government’s in Scotland becoming a Good Food Nation.

High levels of compliance with food safety and food compositional requirements could also be a key measurement of success. An extension of the scope of the Food Hygiene Information Scheme to encompass food standards compliance is advocated, as well as the compulsory display of
3. Do you agree with the proposed vision? How would you improve it?

The proposed vision as it stands is rightly ambitious; however the subjective nature of the statements means that the cultural variations seen throughout Scotland will make achieving this ambition difficult. Removing statements that will be difficult to measure such as a “people taking pride and pleasure in the food served day by day in Scotland” would help. The vision should also be clear on what aspects of our present culinary heritage that we are “rightly proud off”. It would also be beneficial to have an overall definition of what “good food” actually means. The Institute believes that food quality and safety should underpin the definition of “good food” The Institute also believe that Health should also be given a higher priority within the proposed vision. The current vision is very economically driven with particular emphasis on children which means that a generation gap of skills and knowledge relating to food and health may inadvertently be created.

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

As the professional body representing the Environmental Health community throughout Scotland, one area where improvement may be seen is higher compliance with food safety and standards legislation. We could see a more collaborative relationship between the food industry and enforcement officers if high levels of compliance were seen as the norm and not something to aspire to. This would allow enforcement activities to be targeted appropriately and this in turn would benefit compliant food businesses from those who would seek to gain advantage through non-compliance.

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

The Institute believe that it is important to identify measurable outcomes that will complement the overall vision of the policy and engage and drive all stakeholders involved within the Scottish food and drink’s industry. The Scottish Government must all consider the competing factors which could limit progress towards becoming a Good Food Nation, in particular, the continual reduction in food safety and standards resources available within the public sector.

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

The Scottish Food Commission will be crucial to the development, implementation and success of Scotland becoming a Good Food Nation. The consultation document does not set out the explicit role and specific
action that the Food Commission will be responsible for. The Institute is concerned that there may be conflict or a competing role with the establishment of FSS. This is especially noticeable around the proposal for grants for research, an activity expected to be undertaken by FSS. Therefore the role and expectations of the Food Commission and FSS must be clearly defined.

As well as defining the operational, governance and reporting mechanism of the Food Commission, the Institute advocates the appointment of representatives across the entire food chain, including representatives from professional bodies, education and health. The following points are also considered important when considering the establishment of the Scottish Food Commission:

* The Scottish Food Commission must be able to affect change and be independent of Government

* The Food Commission must be able to independently set priorities and represent the views and opinions of all stakeholders across the food chain.

* Public Health and public engagement should be at the heart of how the Food Commission operates

* The Food Commission should be independently led by someone with credibility, drive and supported by an appropriate governance framework

* The role of local food champions is not clearly explained. However the Institute expects that this role will ensure that the key policy areas of the Food Commission are being delivered at a local community level. The local food champion role could be located within local authority environmental health departments where Environmental Health Officers already engage with health services, food business operators, and the third sector as well as members of the public.

* All activities undertaken by the Food Commission should be undertaken in an open, transparent and accountable manner where members of the public are able to scrutinise outputs through, for example, attend meetings or accessing minutes of meetings or relevant reports.

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

There are a number of indicators that already exist and the Institute advocates that these are used or adapted to minimise additional reporting or performance measurements on organisations. However, clear indicators should be promoted in the key areas within the consultation: Health, Education; Food Safety and Standards; Industry; and Community Engagement.

8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?
Although we do not have sufficient information to provide a definitive view on the different approaches, we believe that it is important that there are good liaison arrangements in place to ensure that different policy areas can work effectively with each other across professional boundaries and accountabilities.

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?

The Institute agrees with the initial focus of the policy and recognises that children’s food policy in particular will need to be effectively communicated to parents to ensure that all potential benefits are realised.

Whilst there is a particular emphasis on food in the public sector, attention should also be given to food in the private sector.

The Institute agrees that food in the public sector should be a high priority under this policy. Public sector food should be the ‘gold standard’ in terms of quality, safety, and nutritional content. This will require significant changes to public sector budgets and procurement processes. Procurement process in particular should be more business friendly and encourage local business to enter the public sector food supply chain.

Other potential focus areas include:

- Compulsory nutritional training for staff involved throughout the food industry and supply chain.
- Improved planning guidelines for prohibiting or restricting the number of fast food outlets next to schools.
- Compulsory home economics classes for all children in secondary school. Every child should leave school with basic skills in the planning, preparation and cooking of safe, healthy and nutritious meals. Children should know what constitutes safe and nutritious food.
- Whilst the suggestion of establishing good eating habits in childhood is a priority and welcomed by the Institute, there is concern that unless there is adequate engagement with parents and carers, then the potential benefit of this work might be lost.
- Consumers must be put at the heart of this policy and action must be taken that will allow consumers to make easier and healthier food choices through education, effective regulation, and advertisement.

10. Which other areas would you prioritise?
Please see answer to question nine. REHIS believes that the correct strategic focus areas have been identified. However, it is important that this policy aligns with other policies which contribute to tackling food poverty and food health inequalities. There is very little mention of this in the consultation document.

The Institute believes that food safety and food standards should underpin all policies relating to Scotland becoming a Good Food Nation. Without safe, wholesome food of the correct quality and standard, then policy ambitions will not be achieved. It is disappointing that there is little mention of this within the consultation document.

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

The food industry is a major contributor to the economy of Scotland and improving the national diet through the co-operation of the industry will pay dividends in the future with diet-related health expenditure. As well as investment in the resources available to the public sector, partnership and collaborative working should be at the heart of this policy.

12. What else should be considered?

Any guidance provided to the public sector in relation to procurements should be reviewed and updated as necessary to support the objectives of this policy area.

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?

We would propose to continue to work with our partner agencies, including local authorities, the Food Standards Agency, Scottish Government, SFLEC etc, to promote effective learning opportunities in all areas of the food chain, as well as contribute to the effective enforcement of the law, national policies and guidance.

14. How did you hear about this Discussion Document?