

Response ID ANON-HFVK-6MX8-2

Submitted to **Food Standards Scotland Strategy 2021 - 2026**

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Introduction

1 What is your name?

Name:

Rachel Ward

2 What is your email address?

Email:

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3 What is your organisation?

Organisation:

Institute of Food Science and Technology

4 What industry do you work in?

Choose an option from the dropdown list:

Other

FSS's Vision

5 What are your views on whether this strategy will help to achieve FSS's vision for 'A safe, healthy and sustainable food environment that benefits and protects the health and well-being of everyone in Scotland' (Section 1)

Agree

Comments:

Institute of Food Science and Technology welcomes the opportunity to respond to the strategy for Food Standards Scotland (FSS) 2021-2026. IFST particularly welcomes FSS commitments to independence, transparency and working collaboratively. The strategy was clearly laid out and the insistence and repetition in the different chapters throughout the document of the principle of evidence and science based decisions is laudable.

Mission Statement and Strategic Outcomes

6 Do you agree or disagree that FSS's mission statement reflects what will be needed from us as an effective food body between 2021-26; acting in the best interests of the people of Scotland? (Section 2)

Neither agree or disagree

Comments:

The mission statement expresses the needs for an effective food standards body in the main. There is however an opportunity to add a stronger role for FSS in communication and education relating to food. Although the vision statement mentions sustainable food, it does not appear in the mission statement or the 3 legs of the vision which is a miss. Sustainability parameters are considered in page 19, but we suggest it should have more visibility in the vision itself and be integrated alongside food legality, safety and nutrition into a broader vision to deliver food and nutrition security. We also suggest that the third leg of the vision is overly generic and would merit a re-think. The key point 'To protect the other interests of consumers relating to food' could be re-focused on education and communication with some sub-points moved across to other pillars of the vision. For example the first point on labelling could be part of the second leg 'healthy diets' and the second point on food crime could be part of the first leg addressing 'risks to health'. The third point on identifying factors influencing public interests and concerns could be built upon to create effective communication and education to build awareness and understanding for all food sector stakeholders - including building food and diet education into the school's curriculum.

7 Do you agree or disagree that the 5 strategic outcomes FSS aims to achieve through this strategy will be sufficient to protect the food interests of consumers in Scotland between 2021-26? (Section 2)

Neither agree or disagree

Comments on the 5 outcomes and whether any additional outcomes should be included:

Considerations relating to sustainable diets are missing, especially from the first and fourth points. It is key that diets are affordable, healthy and environmentally sustainable.

8 Do you agree or disagree that the values and guiding principles outlined in the strategy fully reflect what will be required from us to fulfil our consumer protection and regulatory functions between 2021-26? (Section 3)

Agree

Comments:

Data and Evidence

9 Do you agree or disagree with our proposals for using data and evidence to address key priorities highlighted in the strategy? What are your views on how FSS can optimise the use and sharing of data and evidence to deliver this strategy? (Section 4)

Yes, I agree in full

Comments on how FSS can optimise the use and sharing of data and evidence to deliver this strategy:

Evidence, expertise and contextual understanding of the food sector is needed to influence and steer research, education and enforcement policy and programmes relevant to food and feed. We therefore hope that FSS will play a lead role in the Environment, Natural Resources and Agriculture research Centre for Knowledge Exchange and planned Horizon Scanning to ensure research activities can positively impact the agri-food sector with implementable outputs. Likewise we hope that FSS will drive the need for food and diet education to be a priority both in schools and wider public initiatives to enable consumers in making wise choices, for themselves, their families and the planet. Creation by FSS of a similar Centre for Knowledge Exchange approach would facilitate sharing data and evidence gathered from FSS activities on trends in diet and nutrition, foodborne illness, food safety risks and emerging issues. Making these insights available, alongside technical guides and best practices, tools training materials and tools to support compliance for all food and feed sector stakeholders across policy makers, enforcement teams and food and feed operators offers opportunity to grow awareness and build capability to support the Scottish supply chain and consumers alike.

Flexibility and Sustainability

10 Do you agree or disagree that this strategy will enable FSS to be sufficiently flexible to adapt to the impacts of EU Exit and COVID-19 on the food chain in Scotland? (Section 5)

Yes, I agree in full

Comments:

11 Do you agree or disagree that this strategy adequately reflects wider consumer interests with regard to issues relating to sustainability? (Section 5)

No, I disagree

Comments :

Integrating sustainability and environmental / planetary impact alongside food legality, safety and nutrition into a broader vision to deliver food and nutrition security should be core to FSS strategy. Page 19 describes the concept of sustainable food and, although it recognizes its importance, it seems not to be part of the remit of FSS. Many aspects of the next generation sustainable food products will need regulation and standards; for example new plant-based proteins and appropriate labelling descriptors and clear comprehensible labelling of the carbon footprint status; etc. Given the far-reaching impacts of the food system, consistent delivery against integrated multifactorial strategic goals is needed to avoid unintended consequences. To enable this consistent delivery the industry needs a framework to judge multiple impact factors across sustainability, safety, authenticity, legal compliance, consumer preference, positive nutrition, affordability, and ethical welfare to ensure protection of the public and the supply chain. It is critical that all relevant food system stakeholders clearly understand and can measure the holistic impact of changes to food chain systems, to food products and their packaging to both avoid unintended consequences and to achieve the goal of providing access to truly sustainable nutrition. Evidence-based metrics to calculate impacts will retain consumer trust and protection.

12 What are your views on the priorities for FSS's new strategy with regard to reducing health inequalities in Scotland? (Sections 3 and 5)

Comments:

No comment

Delivery of FSS Strategy

13 Do you agree or disagree that the strategy fully reflects the partnerships that FSS will rely on to be able to deliver this strategy effectively? What partnerships will be particularly important in achieving FSS's Vision, Outcomes and Goals? (Section 6)

Yes, I agree that it reflects some of the partnerships but not all

Comments on partnerships that will be important in delivering this strategy:

Educators were no identified as key partners, nor were professional bodies or private assurance scheme bodies.

14 Your views are invited on the key risks and challenges faced by FSS in delivering this strategy and how these should be addressed. (Section 7)

Comments on key risks and challenges:

The current lack of public fundamental understanding of food, where it comes from, how to prepare and store food safely, nutrition and healthy diets has created a level of public food and diet illiteracy. This is a major challenge for FSS in delivering their outcomes and goals around empowering consumers to make safe and healthy food choices. Positive actions are needed to address the lack of public understanding of food and diet – in schools and in wider public health

communication, to provide the necessary foundation for effective consumer communication. A similar challenge is the lack of investment in food technical skills education and on-going professional development across the sector. IFTS positively support the need for competent food technical professionals and high standards of food risk management and verification in food supply chains to give confidence that safety, legal and contractual requirements are being met. The recent NHS Hospital Food Review has recommended a nominated food safety specialist and a named board member responsible for food per NHS Trust, and the need for national professional standards with mandatory continuing, career-long professional development, including appropriate compulsory food hygiene and allergen training. We would suggest extending these recommendations to apply not only to NHS Trust catering, but to every Food Business Operator such that every food business operator should have food technical professional staff engaged who have received compulsory food hygiene, food safety and food allergen risk management training, with a nominated food safety specialist to lead them and Board level commitment to ensuring food is safe and legal. This would then provide the necessary foundation for FSS goals 1 and 2 to be met.

15 Do you agree or disagree that the six goals and activities identified in the strategy reflect Scotland's priorities for public health and consumer protection relating to food over the next 5 years? (Section 8)

Agree

Comments :

The strategic goals and the priority activities under each goal are clear. They would benefit from identifying the measures of success for each goal and activity. Although p.27 mentions performance metrics to come, it would have been more powerful if those metrics were presented in this document. We suggest that Goal 4 should also include information to 'empower consumers to make ... sustainable... choices' and address the lack of public education around food – in schools and in wider public health communication.

16 Do you have any additional comments you wish to include about the FSS Strategy 2021-26?

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Page 10 - it is not clear if the numbers are the current situation or targets.

Page 10 - In the thumbs up and down pictures, the text is not clear as to whether these are research findings or recommendations. If read one way, it seems to imply that people should eat more butter, cream and cheese and less whole milk – which seems odd. Likewise the text beside the thumb down graphic could be read as implying that "people living.....(should) have more: Sugary drinks...!"

On Page 5 and Page 23 we propose that the fourth FSS outcome should also include consideration of environmental sustainability and making positive planetary choices. Suggest 'Consumers are empowered to make positive food choices for themselves, their families and the planet.'