# FOOD STANDARDS SCOTLAND CONSULTATION

**CONSULTATION ON DRAFT STRATEGY AND CORPORATE PLAN**

|  |  |
| --- | --- |
| **Date consultation launched:** | **Closing date for responses:** |
| **8 February 2016** | **4 March 2016** |

|  |
| --- |
| **Who will this consultation be of most interest to?**  **Organisations and individuals interested in the work of Food Standards Scotland.** |

|  |
| --- |
| **What is the subject of this consultation?**  **In accordance with our Code of Governance, we are developing our Strategy and Corporate Plan.**  **These draft documents are the subject of this consultation.** |

|  |
| --- |
| **What is the purpose of this consultation?**  **To give stakeholders and the public the opportunity to comment on the draft Strategy to 2021, and Corporate Plan covering the first part of this period, to 2019.** |

**Responses to this consultation should be sent to:**

**FSS Strategy Consultation**

**FOOD STANDARDS SCOTLAND**

**Pilgrim House, Old Ford Road, Aberdeen,**

**AB11 5RL**

**Email: strategy@fss.scot**



**FOOD STANDARDS SCOTLAND**

**CONSULTATION ON DRAFT STRATEGY AND CORPORATE PLAN**

Food Standards Scotland (FSS) was created on 1 April 2015, through the commencement of The Food (Scotland) Act 2015. FSS is an independent body which replaced the UK-wide Food Standards Agency (FSA) in Scotland. We are a non-ministerial office of the Scottish Administration sitting alongside but not part of the Scottish Government.

Our primary concern is consumer protection – making sure that food is safe to eat, ensuring consumers know what they are eating and improving nutrition. FSS’s vision is: *to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers*.

FSS is accountable to the public in Scotland through the Scottish Parliament. Scottish Ministers have approved our statement on how we will work, and more information about this can be found here:

<http://www.foodstandards.gov.scot/corporate-governance>

In accordance with our Code of Governance, we have developed a draft Strategy to 2021 and Corporate Plan covering the first part of this period, to 2019.

We have engaged with consumers and stakeholders in the development of the draft Strategy and Corporate Plan, which are enclosed with this consultation letter, and we are now seeking further views and comments on these documents.

We would very much welcome your views specifically around the questions outlined below, and any other points or comments you would like to make. Please provide any additional information on an extra page if necessary.

Responses can submitted by email to: [strategy@fss.scot](mailto:strategy@fss.scot)

or by post to: FSS Strategy Consultation

Food Standards Scotland

Pilgrim House

Old Ford Road

Aberdeen AB11 5RL

The closing date for receipt of responses is **Friday 4th March**.

### 

**Consultation Questions**

**Our Strategy: Values and Principles**

1. Do you agree with the *Values* proposed for FSS?

Yes

Please provide any additional comments:

Yes, Nourish welcomes the proposed values set out in the consultation document. We especially welcome the emphasis on openness and transparency in the way that FSS intends to operate. We also welcome the commitment to partnership working and will seek to identify opportunities for collaboration with the FSS in our own work.

1. Do you agree with the *Principles* outlined in our Strategy?

Yes

Please provide any additional comments:

Nourish welcomes the proposed principles and, in particular, the emphasis on reducing health inequalities. Nourish also agrees that FSS actions should support compliant businesses who are operating in ways consistent with achieving the FSS outcome, and be effective at dealing with non-compliant businesses. We agree that those who introduce risks should also take responsibility for managing these risks, as long as this is done in a clear, even-handed and proportionate manner.

1. Do you think that the *Values* and *Principles* will help us to protect consumers’ interests?

Yes

Please provide any additional comments:

1. Are there any other additional *Values* or *Principles* that we should consider?

Please provide any comments:

**Strategic Outcomes**

We have identified six Strategic Outcomes that we believe are the right ones to deliver our Vision - *to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers*. These are outlined below.

Outcome 1: Food is safe

Outcome 2: Food is authentic

Outcome 3: Consumers have healthier diets

Outcome 4: Responsible food businesses flourish

Outcome 5: FSS is a trusted organisation

Outcome 6: FSS is efficient and effective

We have discussed these with stakeholders and consumers, and seek your comments on the wording of **Outcome 2** and **Outcome 4** in particular.

1. Outcome 2 – *Food is authentic*.

Is it clear what we mean by this?

Or would it be clearer to describe this as:

* *Food is accurately described*; or
* *Consumers know what they are eating*.

Please comment on your preferred wording for Outcome 2. Please explain your preference.

The word authentic can be misused and can have some middle-class connotations about whether food is true to its historic origins. Nourish prefers the phrase “Consumers know what they are eating”. This is broad enough to encompass not just the fact that consumers can trust food to be accurately labelled in terms of ingredients, but also that any labelling must accurately describe any health claims or nutritional information.

1. Outcome 4 – *Responsible food businesses flourish*.

Consumers felt this didn’t fully capture their wider interests in food businesses, beyond compliance with food law.

Would this be expressed better as:

* *Food business flourish when they do the right things for consumers*

*Food business flourish when they do the right things for consumers*

Please comment on your preferred wording for Outcome 4. Please explain your preference.

Nourish prefers this latter, broader, role *of Food business flourish when they do the right things for consumers*. It allows for a notion of responsibility as being wider than just complying with minimum standards. For example a business may also be seen as responsible if it produces items consistent with our dietary targets and goals, and in a manner that is environmentally responsible. A broader role allows for the introduction of these more holistic factors.

1. We would value any other comments you have on the *Strategic Outcomes* in the context of our *Purpose* and *Vision*.

Please provide any additional comments:

**Corporate Plan - Key Activities**

1. We have described some of the key activities that we will undertake to 2019 to support delivery of FSS’s Strategy.

Are these the types of activities you expect FSS to do, to deliver our *Purpose* and achieve our *Vision*?

Please provide your comments:

Yes, we generally support the activities set out in the plan and would offer the following more specific comments:

Outcome 1: We welcome the emphasis on empowering citizens and on developing a variety of ways of communicating with different groups. We welcome the work to reduce the spread of infectious diseases and the intention to review the area of shellfish official controls as this has proved to be an area of significant controversy with stakeholders in the past.

Outcome 2: We welcome the proposed joint good practice code with industry on transparent provenance labelling claims, which should assist responsible food businesses. We also support work that helps improve consumer awareness of and engagement with labelling so that people can make better informed choices about their food.

Outcome 3: Nourish very much welcomes the recognition that greater action is needed - by industry and government, as well as by communities and individuals – along with the intention to consider a wide array of measures, including progression from voluntary to regulated/legislative or fiscal measures to ensure we make progress towards the SDGs. We are therefore supportive of the package of work designed to bring about changes to our food environment. We advocate the introduction of a retail and caterer’s levy, requiring operators of multiple (say over 10 or 100) outlets to report periodically on the nutritional composition of their sales.  They would then pay a levy on the difference between their sales and the SDGs – so for example if the added sugar across the board of Supermarket A is 14% (current average) it would pay the levy on the difference between this and the target (5%).  Similar levies could be paid on the excess of saturated fat or the shortfall in fibre. Such a levy would be easy to assess and raise as the nutritional composition of all standard products is known.  It shifts responsibility onto those who feed us to feed us better, and aligns our interests in sourcing a healthier diet for our families and ourselves with the interests of food businesses.

Outcome 4: We welcome the intention to review the Food Law Code of Practice and develop a regulatory strategy to ensure that compliant and responsible businesses flourish and are rewarded whilst non-compliant businesses are dealt with effectively. As well as ensuring that our food is safe, we should also be building a system that rewards food which is produced according to circular economy principles – with effective and efficient resource use, minimal waste and lower environmental impacts wherever possible. There is a role here in going beyond mere compliance, to drive up standards of responsible production, processing and retail.

Outcome 5: We welcome the decision to subject FSS work to a health inequalities impact assessment and the aim of increasing the reach of FSS work to target groups that have not engaged well in the past. We welcome the intention to engage in community-based approaches to health inequalities and consumer protection.

**General**

1. Do our Strategy and Corporate Plan make clear that we are putting consumers first?

Please provide any comments:

We are generally happy with the key enablers set out in the plan, especially in relation to openness and partnership working. We also welcome the recognition of the need to invest in skills development of the workforce and to value FSS and local authority staff engaged in this work.

1. We would welcome any other comments on our Strategy and Corporate Plan.

Please provide any comments:

Nourish is also generally content with the vision set out in the document. However, as well as benefiting and protecting consumers, we would like to see our food and drink actively nourishing citizens and contributing to the improvement of our diet and our health outcomes.

We are pleased to see the clear links set out in the plan between the FSS outcomes and the national outcomes. The matrix setting these out is particularly helpful. We welcome the recognition of the FSS role in tackling inequalities, helping businesses perform to their potential, and also in reducing the environmental impact of our production and consumption decisions. The policy landscape section of the document is helpful, though it could perhaps benefit from a link to the new food waste reduction target (33% by 2025) announced as part of the recent circular economy measures. Likewise, the document would benefit from a link to the UN Sustainable Development Goals that this food waste target refers to.

|  |  |
| --- | --- |
|  |  |

##### What Happens Next?

##### Handling Your Response

Following the closing date of the consultation, all responses will be analysed, and will help inform our Board in finalising our Strategy and Corporate Plan.

A summary of consultation responses will be published on our website.

We need to know whether you are happy for your response to be made public. If you ask for your response not to be made public we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that Food Standards Scotland is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

If you have any comments about how this exercise has been conducted, please send them to us at the address on the first page of this document.

To assist us with handling your response, please complete the respondent information form overleaf, and return it with your comments.



**RESPONDENT INFORMATION FORM**

**FOOD STANDARDS SCOTLAND**

**CONSULTATION ON DRAFT STRATEGY AND CORPORATE PLAN**

|  |  |
| --- | --- |
| Organisation Name | Nourish Scotland |
| Organisation Address | Summerhall  1 Summerhall Square  EDINBURGH EH9 1PL |
| Contact Name | Tracey Reilly |
| Email address | tracey@nourishscotland.org.uk |
| Contact telephone number |  |
| Do you give permission for Food Standards Scotland to publish your response? | Yes |
| Would you be happy for Food Standards Scotland to contact you again? | Yes |



##### Publication of Personal Data

###### Please note that Food Standards Scotland may publish details that you supply in legitimate pursuit of the functions of the organisation.

As the publication of responses in full may include personal data (such as your full name and contact address details), would you please let us know if you object to us using this information.

Please tick the box below, complete the relevant details and return this form (together with your response) to indicate your objection.

|  |  |
| --- | --- |
|  | I **do not** agree to the publication of my personal details. |

\* If no objection is received we will assume that you consent to full disclosure of your personal details and these may be published.

|  |  |
| --- | --- |
| Full Name |  |
|  |  |
| Full postal address |  |

To comply with the *Data Protection Act 1998*, it is essential that we keep our records up to date. Would you therefore please inform us if your personal details change in any way.

|  |  |
| --- | --- |
| This form has been issued by: | Food Standards Scotland |
|  |  |
| If you have any queries, please contact: | [openness@fss.scot](mailto:openness@fss.scot) |

*General information about the most recent Data Protection Act can be viewed on the Information Commissioner’s Office website at* [*www.datapr**ote**ction.gov.uk*](http://www.dataprotection.gov.uk/)*.  
For general enquiries you may contact Tel: 01625 545745*