

FINALISING FOOD STANDARDS SCOTLAND'S NEW STRATEGY FOR 2021-26 Healthy, Safe, Sustainable: Driving Scotland's Food Future

1 Purpose of the paper

1.1 For discussion and comment

- 1.1 Over the past year, the Executive has been developing FSS's future strategy for 2021-26. A draft strategy was prepared during the first half of 2020, despite the resource pressures resulting from the COVID-19 pandemic. For FSS, having a strong direction of travel was considered important by the Board and Executive alike, in order that effort and resource could be marshalled according to our agreed priorities. The draft Strategy was based on the outputs of consumer, stakeholder and staff engagement events, and initial discussions with the Board. The document was provisionally titled '*Protecting Scotland in a Changing Food Environment*', and issued for a 9 week public consultation between 19 October and 21 December 2020. At the end of January 2021, Board members had the opportunity to review the consultation feedback and provide further input into the content of the new strategy.
- 1.2 We have finalised the strategy document in light of feedback and comments received through the consultation process and are now seeking approval from the Board for its publication. The final Strategy document is provided at **Annex A** of this paper, and the outputs of the consultation process are summarised at **Annexes B and C**.
- 1.3 The Board is asked to:
- **Note** that there were 89 written responses to the consultation on the draft strategy, with 11 key themes identified from the feedback;
 - **Note** the changes made to the draft strategy document based on the consultation feedback and subsequent discussions with the Board;
 - **Note** the agreed title "**Healthy, Safe, Sustainable: Driving Scotland's Food Future**" which has unanimous support from FSS Board members.
 - **Approve** the finalised document and our proposal to launch the new strategy in May 2021;
 - **Agree** to the proposed timetable for finalising the 3-year corporate plan and corporate governance documents which will support the delivery of our new strategy;
 - **Note** plans to promote and implement the new FSS strategy during 2021 and beyond.

2 Background

- 2.1 The Executive presented its [initial proposals for FSS's new strategy for 2021-26](#) at the Open Board meeting in June 2020, and has been engaging with the Board throughout its development. A draft Strategy document was issued for public consultation under the working title '*Protecting Scotland in a Changing Food Environment*' with an over-arching vision and mission statement highlighting our ambitions for the future. The Board agreed to 5 new strategic outcomes with delivery centred around 6 goals, focussing on our use of data and evidence; the need to adapt to a changing food environment (focussing on the impacts of EU Exit and the COVID-19 pandemic); and FSS's future role in representing consumer interests in wider food issues, with particular regard to sustainability.

- 2.2 The consultation ran for 9 weeks (20 October - 21 December 2020) and generated 89 responses from a range of organisations (detailed in **Annex B**). 86 of the responses came via our on-line survey platform "Citizen Space", with a further 3 written responses emailed separately. Additionally we held online consultative events (9th and 14th December 2020), attended by 17 different stakeholder groups. These events sought additional feedback around the consultation questions, and helped us to understand more about the priorities of our key stakeholders and hear more detailed views on the title and content of the strategy.
- 2.3 The figures in Annex B demonstrate clearly that the majority of respondents expressed positive views about the key proposals put forward, with 63-93% agreeing or strongly agreeing with the nine multiple choice questions raised in the on-line survey. It is worth noting that the "disagree" and "strongly disagree" responses for the multiple choice questions were not necessarily accompanied by negative comments. In fact many of these responses expressed a view that the strategy should go further in certain areas, or that there was a need for greater clarity.
- 2.4 All comments received in writing and through discussions at the webinar events were analysed, resulting in the identification of 11 key themes, which are described in **Annex C**. Board members have already had the opportunity to review these and provide additional comments which we have taken into account, along with the consultation feedback, to produce the finalised strategy document provided at **Annex A**.

3 Discussion

Taking account of consultation comments and feedback from the Board

- 3.1 The consultation process was invaluable in helping us to refine the content of the strategy and understand what is important to Scotland. We have made a number of changes to the document to take account of the responses and subsequent feedback from the Board. These changes are listed below. We also intend to draw on some of the ideas and insights summarised in Annex C to develop our Corporate Plan, which will provide more detail on the activities we will take forward over the first 3 years of the new strategy.
- **Strategy title, vision and mission statement** The new title addresses feedback that the strategy should have a positive, forward looking strapline. The mission statement was also amended to provide greater clarity regarding FSS's remit and ambition for the future.
 - **Values and guiding principles** Our value 'Consumer Focussed' now gives greater emphasis to the importance of recognising diversity in all of our work. We have also included a new value titled 'Fair and Proportionate' to reflect our obligations as a regulator, and have combined 'Open and Transparent' with 'Inclusive' to produce a new value titled 'Open and Inclusive', which better captures the aim to publish our evidence base and ensure those affected by our decisions have the opportunity to contribute.
 - **Strategic outcomes** A number of respondents expressed a view that they considered FSS's organisational objectives to extend beyond simply being trusted and that it was also important to acknowledge our role in influencing policy and behaviours. We have therefore changed the wording of our 5th outcome to: *FSS is trusted and influential*
 - **Goals and activities** Goal 2 has been amended to better reflect the "Educate Enable and Engage" elements of the Compliance Spectrum approach outlined in our Regulatory Strategy. Goal 4 now includes reference to sustainability and reflects that consumer choice is impacted by the wider food environment, not only food information. Goal 6 has been

reworded to place greater emphasis on food education as a means of reaching out to communities and targeting interventions for improving diet and health.

- **Diet and nutrition** We have strengthened the wording of references made to our future work on diet and nutrition to emphasise our ambition to influence tangible improvements to dietary health in Scotland, make better use of our evidence base to evaluate policy and raise public awareness, and highlight the importance of partnership working in this area, particularly with regard to our relationships with Public Health Scotland and the food and drink industry. Following feedback from stakeholders, we have also undertaken to explore wider impacts on diet including the contribution made by alcohol to calorie intake.
- **Science and evidence** A number of consultation responses highlighted the need for FSS to place greater emphasis on the use of social sciences to understand consumer behaviours and effect positive change. Reference to the importance of social sciences has been included in the Section titled '*What We Will Deliver*' with particular regard to understanding the impacts of COVID-19 and EU Exit on consumer attitudes and behaviours.
- **Adapting to a changing food environment** In the draft strategy, this section was placed towards the end of the document and had focussed on the impacts of EU Exit and COVID 19. Based on consultation feedback and subsequent discussions with the Board, this has been moved forward and expanded to include climate change as another key driver of change that we would need to consider throughout the delivery of this strategy.
- **FSS's role in sustainability** Overall, the consultation responses were positive about the inclusion of sustainability in our new strategy, although a number of stakeholders suggested there was a need for us to more clearly define the specific areas where we had a role to play. Following further discussions with the Board, we have decided to retain reference to the full spectrum of issues that tend to be associated with sustainability, clarifying that these are wider policy interests that link to our strategy.
- **Key partnerships** This section has been amended to provide more clarity regarding our working relationship with Public Health Scotland in relation to dietary health improvement. We have also added community groups and educators to our list of key partners, and highlighted the importance of collaborations with food businesses and trade bodies in delivering this strategy.
- **Challenges and Risks to Delivery** We have highlighted the need to take account of impacts of public sector resources on FSS as well as Local Authorities, and have included Misinformation as an additional risk which FSS will need to address in order to maintain consumer trust, particularly with regard to the influence of social media.
- **Addressing Health Inequalities** The strategy has been amended to give more prominence to our role in tackling health inequalities, and now provides reference to our obligations regarding the Scottish Health Inequalities Impact Assessment and Fairer Scotland Duty process to demonstrate the impacts of our policies and decisions.

Next steps - finalising the strategy

- 3.2 The Executive is seeking approval for the content presented in the latest draft of the Strategy document at Annex A, including the proposed title, based on Board members' preference. Provided the Board is content to sign off the content and title, we will work with publishers to enhance the style and graphics of the document prior to launching our new Strategy in the Spring. The final version will be shared with Board members before publication.

4 Communications

- 4.1 In order to comply with restrictions leading up to the Scottish Parliament election scheduled for May 2021, we plan that the formal launch of our new strategy be on the day of the next open board meeting on 19 May 2021. At the May meeting, we will present revised corporate governance documents to support the new strategy, along with the 3-year Corporate Plan and risk register which will underpin its delivery. The Board will wish to note our intention to embed the new Corporate Plan across all of our business delivery and financial management procedures from 1 April 2021.
- 4.2 A communications 'launch plan' has been developed to support the publication, promotion and embedding of the new strategy, both internally and externally. It sets out a targeted approach for engaging with key stakeholders and ministers, and a variety of communications and marketing activities to optimise reach. This includes a new 'About Us' section on the FSS website which will host the strategy and supporting promotional materials (such as infographics and animations), a national press release, remote forum events and social media activity.

5 Equality impact assessment and Fairer Scotland duty

- 5.1 The Board has had sight of initial drafts of the Equality Impact and Fairer Scotland duty assessments which have been developed to consider how our new strategy will address the needs of different population groups, and take account of socio-economic inequality issues and deprivation. These documents are being finalised to take account of consultation feedback and will be published alongside the strategy.

6 Conclusion

- 6.1 This new strategy sets out an ambitious road map for FSS over the next five years and represents a significant milestone for the organisation as it matures and grows. With a backdrop of the Covid-19 pandemic and significant upheaval that stems from EU-Exit, it is more important than ever that we are able to articulate a clear vision and set goals for delivering our priorities in an ever changing food environment. The consultation process has served to demonstrate the level of public interest in FSS, and broad support from our stakeholders for our proposed direction of travel. Board sign off will enable us to focus on plans for promoting the strategy and engaging with others on our plans to take it forward.

6.2 The Board is asked to:

- **Note** that there were 89 written responses to the consultation on the draft strategy, with 11 key themes identified from the feedback;
- **Note** the changes made to the draft strategy document based on the consultation feedback and subsequent discussions with the Board;
- **Note** the agreed title “**Healthy, Safe, Sustainable: Driving Scotland’s Food Future**” which has unanimous support from FSS Board members.
- **Approve** the finalised document and our proposal to launch the new strategy in May 2021;
- **Agree** to the proposed timetable for finalising the 3-year corporate plan and corporate governance documents which will support the delivery of our new strategy;
- **Note** plans to promote and implement the new FSS strategy during 2021 and beyond.

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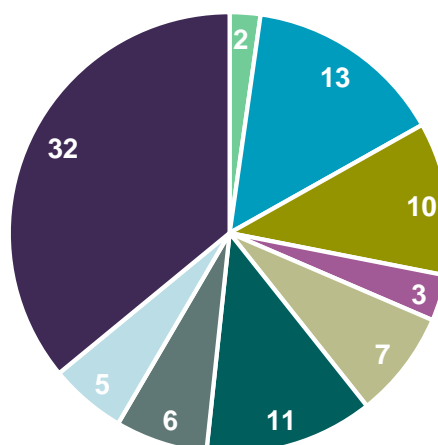
17 February 2021

Annex A – Strategy Document

ANNEX B – Breakdown of Consultation Respondents and Multiple Choice Answers

Breakdown of 89 Consultation Respondents

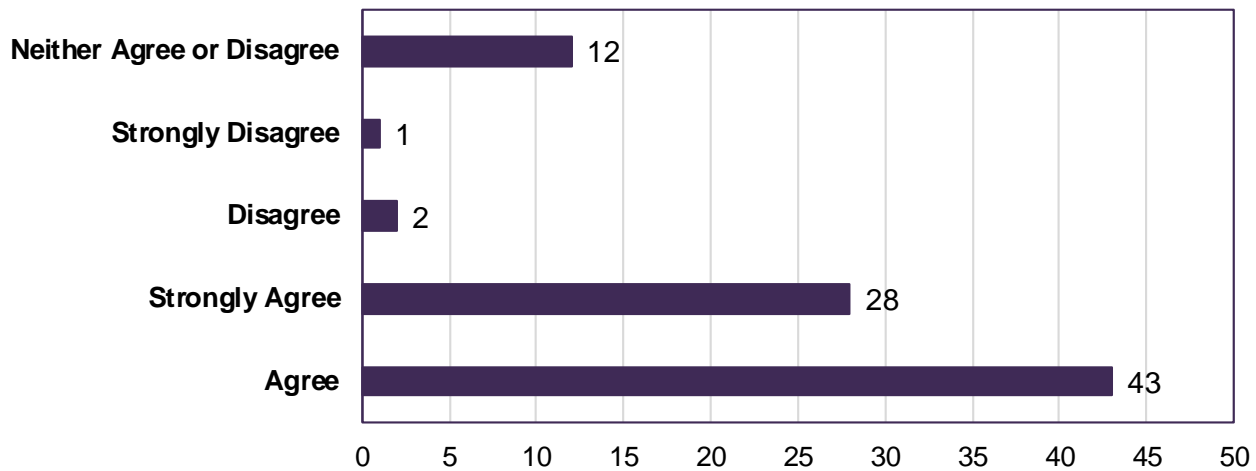
- Feed Business
- Food Business
- Food Industry Body
- Government/Agency
- Public Health Professional
- Local Authority
- Scientist/Researcher/Academic
- Third Sector
- Consumer



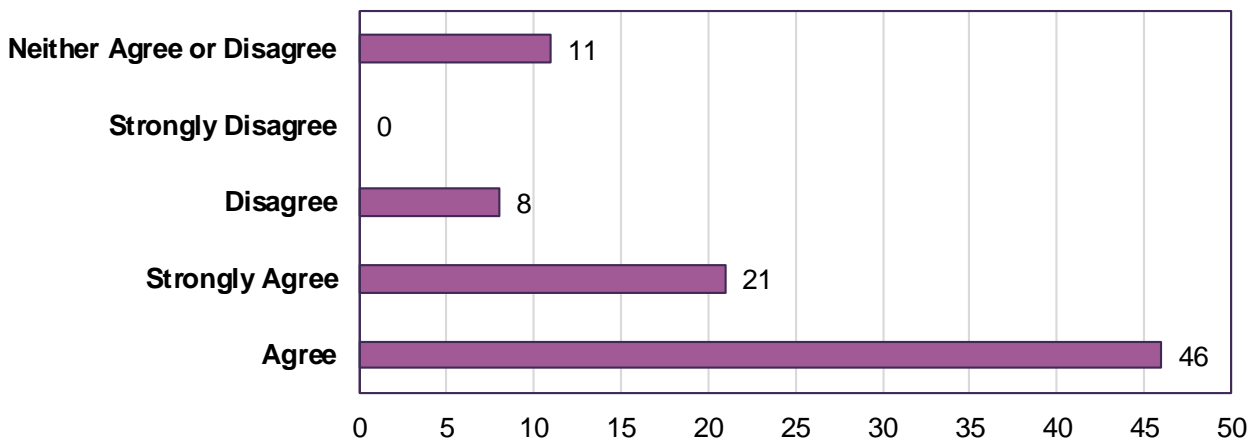
Participating Organisations (On-line Consultation and Webinar Events)

LOCAL AUTHORITIES	GOVERNMENT/ AGENCIES	INDUSTRY BODIES	THIRD SECTOR	UNIVERSITIES/ INSTITUTES
Highland Council	Scottish Government	Scottish Beekeepers' Association	Edinburgh & Lothians Regional Equality Council (ELREC)	Glasgow Caledonian University
Renfrewshire Council	Scottish Public Health Nutrition Group	National Farmers Union (NFU) Scotland	Action on Sugar/Action on Salt	University of the West of Scotland
East Ayrshire Council	NHS National Services Scotland	Food and Drink Federation Scotland	The Soil Association Scotland	Scotland's Rural College (SRUC)
North Ayrshire Council	Zero Waste Scotland (ZWS)	UK Hospitality	Natural Source Waters Association	Moredun Research Institute
East Ayrshire Council		Agricultural Industries Confederation (AIC) Scotland	Cancer Research UK	Institute of Food Science and Technology (IFST)
Fife Council		Quality Meat Scotland	Alcohol Focus Scotland	
Glasgow City Council		Scottish Wholesale Association	Scottish Food Coalition	
Royal Environmental Health Institute of Scotland		Scottish Association of Meat Wholesalers (SAMW)	Obesity Action	
		British Soft Drinks Association	Beat Eating Disorders UK	
		Dairy UK		
		Food Manufacture		
	Scotland Food and Drink (SFD)			

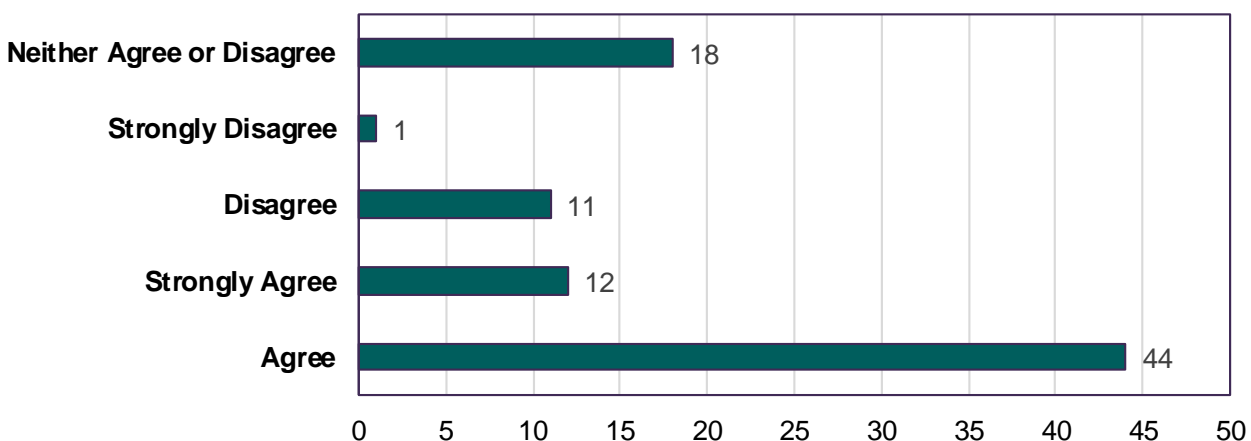
Question 1: What are your views on whether this strategy will help to achieve FSS’s vision for ‘A safe, healthy and sustainable food environment that benefits and protects the health and well-being of everyone in Scotland’



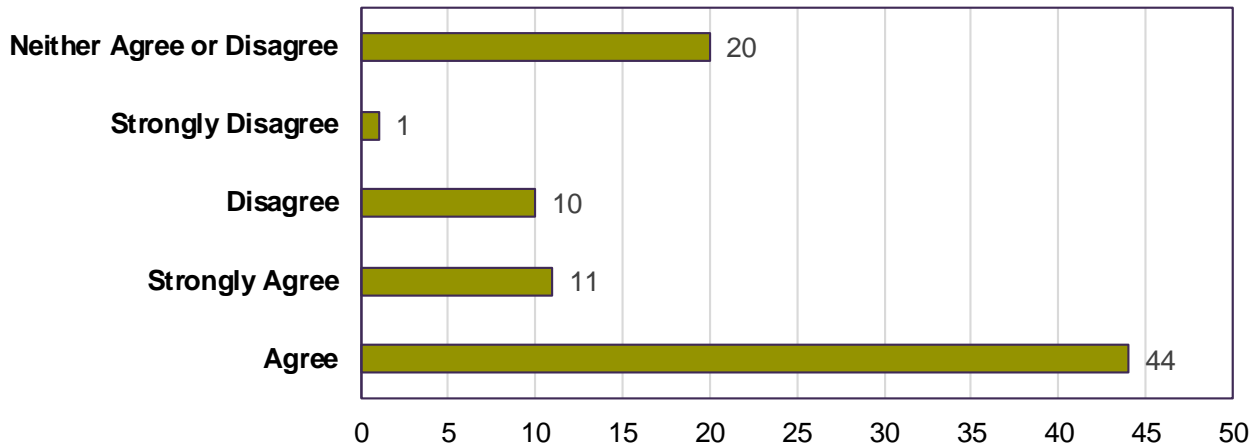
Question 2: Do you agree or disagree that FSS’s mission statement reflects what will be needed from us as an effective food body between 2021-26; acting in the best interests of the people of Scotland?



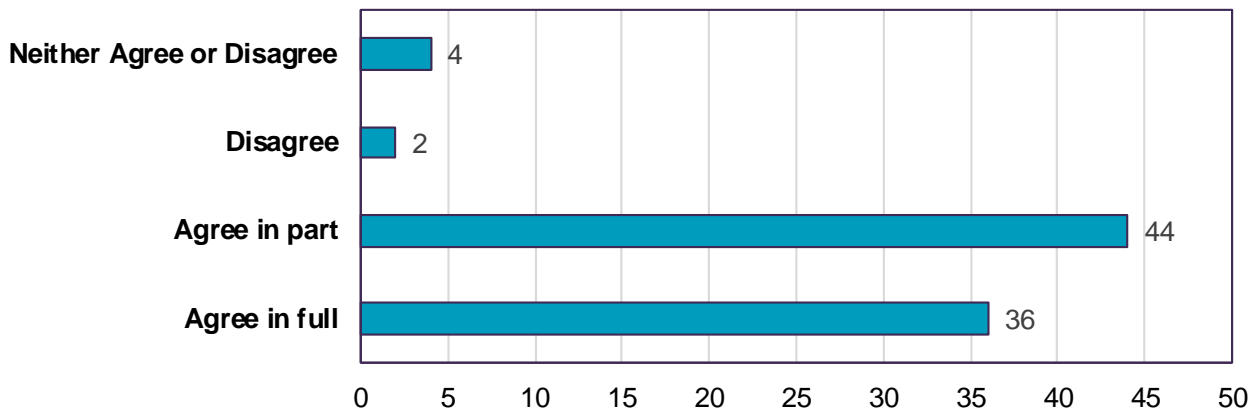
Question 3: Do you agree or disagree that the 5 strategic outcomes FSS aims to achieve through this strategy will be sufficient to protect the food interests of consumers in Scotland between 2021-26?



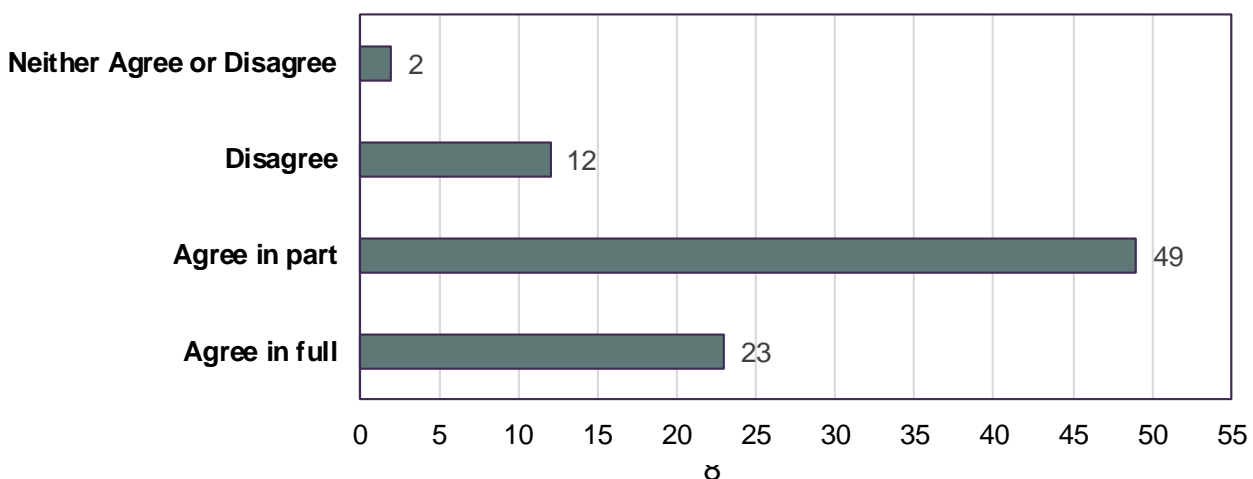
Question 4: Do you agree or disagree that the values and guiding principles outlined in the strategy fully reflect what will be required from us to fulfil our consumer protection and regulatory functions between 2021-26?



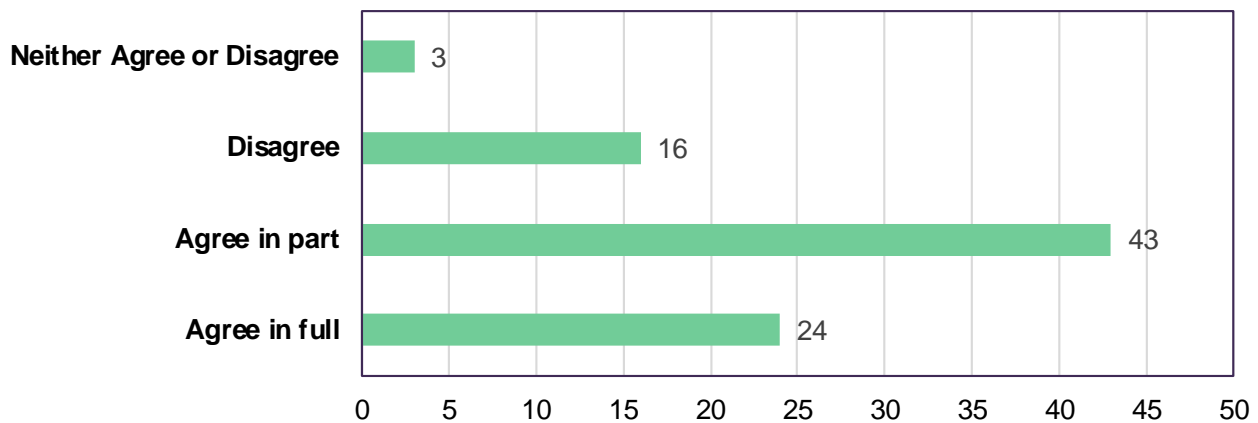
Question 5: Do you agree or disagree with our proposals for using data and evidence to address key priorities highlighted in the strategy?



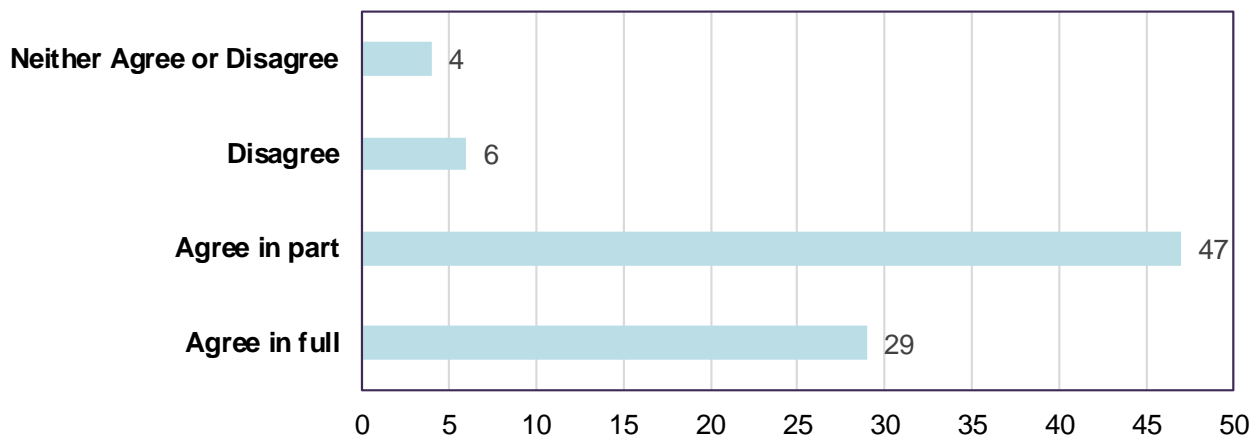
Question 6: Do you agree or disagree that this strategy will enable FSS to be sufficiently flexible to adapt to the impacts of EU Exit and COVID-19 on the food chain in Scotland?



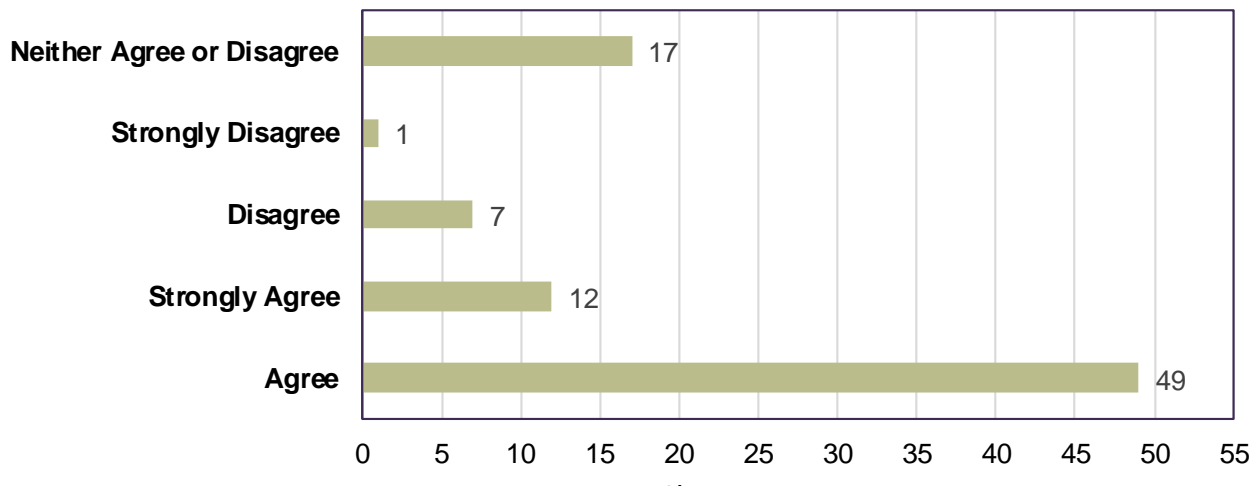
Question 7: Do you agree or disagree that this strategy adequately reflects wider consumer interests with regard to issues relating to sustainability?



Question 9 - 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?



Question 11 - 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?



ANNEX C – Summary of Written Consultation Responses

11 themes were identified in our analysis of responses:

1. *Strategy title, presentation and overall content*
2. *Vision and mission statement*
3. *Values and guiding principles*
4. *Strategic outcomes, goals and activities*
5. *Diet and nutrition*
6. *Strengthening our use of data and evidence*
7. *Impacts of EU Exit and COVID-19*
8. *FSS's role in sustainability*
9. *Key partnerships*
10. *Challenges and risks to delivery*
11. *Addressing health inequalities*

1. Strategy title, presentation and overall content

- A number of respondents questioned the reference to 'Protecting Scotland' in the title. Some felt that it was balanced towards FSS's food safety remit, and did not adequately capture our role in improving the Scottish diet. Further concerns were raised that it could be interpreted as defensive, implying a latent risk in the food chain which consumers needed to be protected from. There was a clear preference for a more positive title, which reflected FSS's aspiration to drive improvement, describing our role as 'Helping', 'Supporting', or 'Leading' in the food and public health landscape.
- Some respondents indicated that there was a need for FSS to clarify whether the strategy covered food and drink, with particular regard to the role of alcohol in diet related disease in Scotland.
- Overall, respondents considered the document to be clear and understandable, although it was suggested that it would be useful for it to be supported by additional resources to support levels of awareness and understanding by interested parties. This includes the production of concise summaries/infographics that would be more likely to be read by consumers and lay audiences, in addition to a more detailed delivery plan which enabled stakeholders to understand how FSS's work over the next five years will impact them.

2. Vision and Mission Statement

- Whilst there was general support for our vision for a 'Safe, Healthy and Sustainable' food environment, some concerns were raised that these were broad terms and that it would be useful for the strategy to define what this meant, in the context of FSS's remit in these areas. Questions were also raised about the balance of these aspirations, particularly with regard to sustainability. Some respondents noted that the strategy was unclear about FSS's role in this space, and that there was scope for it to have more prominence within the outcomes, values and goals (see below).
- Some respondents questioned the need for 'benefits and protects' in the vision, stating that it could be one or the other.
- Concerns were raised about the mission statement presenting FSS as the leading authority on food and diet, which were very wide ranging disciplines. Respondents felt

the statement could be more explicit about FSS's role in these areas, especially in relation to diet.

- A number of respondents expressed the view that there was scope for the mission statement to provide greater emphasis on FSS's role in education and promoting compliance through more effective partnership working with the Scottish food industry.

3. Values and Guiding Principles

- There was a suggestion that the first value, 'Consumer focussed' could be opened up to include communities in order to better reflect diversity in the Scottish population and capture the need for the work of FSS to reach all parts of society.
- Respondents particularly welcomed reference to 'Inclusive' as one of our values, although it was noted that there was scope for this to provide a clearer link to Scottish Government's national outcome relating to human rights. It was suggested that this value should be linked to a guiding principle giving individuals the opportunity to participate in shaping decisions that impact on their right to safe and healthy food. This would make FSS more accountable for ensuring an inclusive and rights based approach to our work.
- Some respondents noted that the bullet points currently sitting under 'Open and Transparent' do not represent this value and relate more to FSS's role as a regulator. It was suggested that 'Open and Transparent' should be accompanied by guiding principles that reflect how we will share our data and evidence and promote trust. It was felt that the current bullet points under 'Open and Transparent' should remain, but given a new Value titled 'Fair and Proportionate' which would better align with our Regulatory strategy.
- There was another suggestion that 'Open and Transparent' could be combined with 'Inclusive'. It was further highlighted that this should be more explicit in relation to the need for FSS to connect with the industry – rather than just consumers – to promote a positive food culture and a safe, healthier diet.
- A question was raised over our guiding principle under 'Independent' to "*influence UK policy and risk analysis, taking distinctive decisions for Scotland when the evidence supports it*". Whilst it was recognised that FSS had a clear role in providing a reliable evidence base to inform policy, there was a concern that reference to 'influencing policy' in this context may be at odds with FSS's independence from Government.

4. Strategic Outcomes, Goals and Activities

- Respondents noted that there was scope for the strategy to more clearly reflect the constitutional matters that FSS will be required to navigate post EU Exit (see below). It was suggested that the Goals and activities should make specific reference to FSS's role in ensuring alignment with Common Frameworks, whilst ensuring specific differences in Scotland were recognised.
- One respondent suggested that Goal 2 could be reworded to better reflect the "Educate Enable and Engage" elements of the Compliance Spectrum rather than focus on sanctions.

- A suggestion was made that the Strategic Outcomes should include reference to sustainability, either in Outcome 1 (Food is Safe, Authentic and Sustainable), or Outcome 2 (Consumers have healthier and more sustainable diets). Respondents also felt that sustainability should be reflected in the title of Goal 4 (i.e. to empower consumers to make safe, healthy, authentic **and sustainable** choices).
- There was support for the new outcome '*Consumers are empowered to make positive choices about food.*' However it was noted that this could not be achieved only by improving the transparency of food information (as described by Goal 4), which shifted the onus on to the consumer. It was highlighted that this would not drive the dietary improvements which are urgently needed without addressing a system that was actively working to promote unhealthy choices. Achieving this outcome therefore also relied on FSS being able to engage and influence the manufacturers and distributors of unhealthy food and drink
- Respondents felt that FSS needed to be more than a 'trusted' organisation and that this outcome should also refer to having an impact on government policy and a demonstrable influence over the food chain – from growers all the way to consumers.
- One respondent expressed concern that the Goals and activities lacked clarity and emphasis with regard to our role in supporting policy and regulatory interventions for reducing overweight, obesity and diet-related illnesses (see below).

5. Diet and Nutrition

- Respondents commended the work FSS already undertakes to monitor Scotland's diet, and noted the importance of maintaining our status as the expert source of evidence-based dietary health advice and recommendations. However, it was felt that the translation of this evidence into action was somewhat lost within the strategy document. Some respondents highlighted that given the lack of success in achieving dietary goals, our strategy didn't go far enough in this regard, and that FSS also had an important part to play in calling for action, with a much stronger role in driving and influencing policy aimed at improving the food environment, particularly in more socially deprived areas of Scotland.
- A number of respondents suggested that the infographic shown on page 10 should not be included in the document as it presents people living in deprived areas in a negative light and also appears to demonise foods including butter, whole milk and cream. This was considered to be counterproductive to our vision for healthy and sustainable diets, with a suggestion for the strategy to propose a review of the Eatwell Guide to give more focus on natural foods and local supply chains which may help to promote increased consumption of fruit and vegetables and sustainability.
- Several respondents highlighted FSS's unique position as a trusted, independent expert body, but suggested that there was potential for this role to be extended to provide greater scrutiny over dietary health policy and evaluation of the impacts. Some noted the failure of previous UK and Scottish Government policies on reformulation, promotions and advertising, attributing this to a number of issues, including a lack of accountability, under-funding, and an over-crowded policy and delivery space. It was therefore suggested that FSS could play a more proactive role in evaluating and publishing the outcomes of Government action on diet and nutrition as a means of promoting change.

- One third sector organisation highlighted Scottish Government's plans for Bills on Food Promotions (which has now been put on hold) and Right to Food, as critical levers for improving the Scottish diet. It was noted that FSS had a key role to play in developing and enabling the legislative measures put forward in these Bills, and in ensuring that proposals for a new statutory independent Food Commission did not duplicate or undermine our work. Respondents from the food and drink industry indicated that it would not be possible to make positive change without buy-in from the relevant sectors, and felt that FSS could do more to engage at this level. Industry, public health and third sector respondents shared a common view that FSS was uniquely placed to do something different on diet and nutrition, by generating evidence that reflected the complexity of the issues, and supporting collaborations between government and industry which were capable of delivering improvement.
- A number of respondents felt that FSS could play a more prominent role in drawing evidence from other countries where novel approaches have proven successful in improving dietary health. For example the Danish Whole Grain partnership which has helped to double wholegrain intake over a ten year period (<https://fuldkorn.dk/english/>). It was also noted that there could be benefit in drawing a link between dietary health and the environment, citing reports from Sweden, where concerns over environmental impacts were found to be a motivating factor in increased fruit and vegetable consumption. Respondents also noted an initiative in Amsterdam, where a holistic "Rainbow Model" on childhood obesity has driven changes to urban planning and retail layouts to create healthier food environments¹; and one in Copenhagen, where targets for increasing the use of organic food in the public sector have resulted in healthier and more sustainable food offerings.
- One respondent highlighted that it was important for FSS's work on diet and nutrition to include alcohol consumption. They noted that extending advice on what constitutes a healthy diet to include information on alcohol would enable robust and comprehensive monitoring and analysis of data on alcohol's contribution to diet and improve awareness of the impact of alcohol consumption on health.
- Strong views were expressed by a number of respondents that there was a need for FSS to place additional emphasis on the role of education in promoting healthier diets. It was noted that low levels of public understanding about food and how it is produced, coupled with a lack of cooking skills presents a major hurdle to the delivery of a healthy food environment. Responses were submitted across all stakeholder groups that education should be a priority for our strategy, working with schools and communities to develop strategies for improving skills and knowledge and promoting a healthy relationship with food.

6. Strengthening our use of data and evidence

- Many respondents highlighted the need for FSS to strengthen its social research programmes to understand and navigate evolving consumer attitudes and behaviours in the changing food environment. It was noted that understanding why people make certain food choices, how they prepare and consume food and how much they waste would help to improve the tailoring of food messaging which enabled people to make healthy dietary choices and feel good about them.

¹ http://www.nourishscotland.org/wp-content/uploads/2018/08/Food-Atlas_FINAL_online.pdf

- It was noted that this strategy presented an opportunity for FSS to re-focus its research programme on diet and nutrition. This would involve moving beyond the collection of simple household purchase data to enable trends to be disaggregated based on more detailed food groups consumed within families. Responses to this question also reiterated support for more research aimed at identifying strategies for influencing dietary choices or food compositional changes (e.g. to reduce fat and sugar and improve nutrient density) that have been tried and tested in other countries and proven to deliver positive health outcomes.
- Some stakeholders noted the extensive, fast moving coverage of new research and scientific debate relating to diet and health and felt that FSS had an important role to play in 'fact checking' and publicising the evidence to ensure that the public was accurately informed and that decisions were driven by robust and up to date science rather than historic policies and popular opinions.
- A number of respondents welcomed our focus on data science and there was a shared view that FSS should publish open data sets generated through all of its research, surveillance and monitoring activities. However it was noted that FSS's data is not currently as accessible as it could be – both in terms of how it is presented, and also where it is placed on our website. Responses acknowledged that digitalisation was the key to effective data sharing and highlighted the need for FSS to give priority to ensuring data sets were available in a format and timescale which enabled them to be useful to stakeholders. This work should focus on the development of on-line platforms which allow data to be accessed easily and presented in customised formats (e.g. infographics and dashboards).
- With regard to data and evidence relating to foodborne illness, respondents were positive about our reference to enhancing the use of Whole Genome Sequencing (WGS), although it was noted that there were challenges to be overcome to promote the sharing and optimisation of these data sets. There was a shared view that FSS had a role to play in supporting collaborative research efforts between scientists, public health bodies and laboratory partners to ensure appropriate systems were in place that enabled samples and WGS data sets (including metadata) to be shared more easily between interested parties, so that the outputs could be maximised.
- It was highlighted that there may be a need for FSS to shift the focus of its evidence programmes post EU Exit with an increase in surveillance activities targeted to imported products which may present a higher risk in terms of food safety and fraud. Respondents noted that changes in import controls are likely to require surveillance programmes to cover a larger volume and different range of foods than have previously been assessed. It will therefore be particularly important for FSS to support laboratories in method development to ensure Scotland has the analytical capability to test for contaminants, pathogens and authenticity markers in a variety of food types, and carry out high-throughput screening.
- One respondent highlighted the potential for FSS to work more closely with the food industry to develop more co-ordinated approaches to food surveillance and the use of new technologies such as block chain and distributed ledger technologies to support the verification of provenance across the whole Scottish food chain.
- Respondents also highlighted the need for FSS to make better use of evidence from international veterinary and food safety surveillance for horizon scanning purposes to

enable a more proactive approach for identifying how changes in food supply impact on safety and authenticity and other risks such as antimicrobial resistance.

- Respondents noted that FSS's science and evidence strategy could place a more prominent focus on the promotion of knowledge exchange across the wider agri-food sector. Scottish Government's Environment, Natural Resources and Agriculture research strategy was highlighted as an important gateway for FSS to contribute data and evidence gathered from its research, surveillance and monitoring activities and promote knowledge exchange. A number of stakeholders highlighted that contextual understanding of the food supply chain was integral in ensuring research, education and enforcement policy was effectively targeted. It was suggested that FSS had an important role to play in promoting the levels of knowledge across government to assist in the development of realistic policy goals and practical support for Scottish food and feed businesses.

7. Impacts of EU Exit and COVID-19

- The majority of respondents agreed that the strategy largely reflected how EU Exit and COVID-19 have impacted on the work of FSS. However, some stakeholders felt that in light of the significance of these events, they should be covered earlier in the document.
- A number of respondents noted that there was insufficient clarity about EU Exit to provide a definitive view at this stage, suggesting that FSS should consider extending the consultation into January 2021 to take account of the UK/EU trade deal. It was further noted that there was significant uncertainty around the impacts of COVID-19 over the long term, particularly with regard to workforce and public sector resources. There was a widely shared view that, in light of the dynamic nature of the current environment, it will be critical for FSS to be flexible, and keep this strategy under on-going review.
- Some responses noted concerns that the public did not fully understand the implications of EU Exit, and that there was a need for FSS to provide reassurance that it would not constrain our ability to maintain existing safety and standards or put pressure on the industry to improve the labelling and nutritional value of foods.
- A number of respondents noted the significant impacts of EU Exit and COVID-19 on the Scottish food and drink industry, which was dominated by SMEs. There was a shared view that it would be important for this strategy to recognise the significant additional burdens that have been placed on smaller businesses and their particular vulnerability to risk. It was therefore suggested that FSS gives priority to the provision of technical support and education targeted to SME producers in Scotland.
- Several stakeholders acknowledged that both EU Exit and COVID-19 has generated significant increased workload for FSS and Local Authorities (LAs), and highlighted the importance of ensuring adequate resources were available to support Scottish businesses in meeting new requirements and protect consumers from emerging risks. They noted that, in addition to increasing staff resources, it will also be important for FSS to identify pressure points and build flexibility into its operating model to ensure it is able to adapt and address conflicting priorities. One respondent commented on the magnitude of risk analysis functions previously undertaken by the European Food Safety Authority (EFSA) and highlighted the need for greater clarity on how these will be delivered by FSS and FSA over the term of our strategy.

- There was a shared view that maintaining high regulatory standards, quality assurance and effective international partnerships should be priorities for FSS in this new strategy. Some respondents felt that greater scrutiny would be placed on FSS's role post EU Exit to maintain standards that were largely taken for granted whilst we were still a member of the EU. A number of stakeholders also expressed uncertainty about Scottish Government's future relationship with Westminster. There was a shared view that the UK Common Framework would be key to this and should be given more prominence in the strategy. Stakeholders highlighted particular concerns about the impact of the Internal Market Bill, which was viewed as a potential threat to the work of FSS and detrimental to the food environment in Scotland.
- Concerns were raised over the level of influence Scotland will have on the negotiation of new trade deals, and how these arrangements would be likely to impact on 'the Scottish brand', food safety and the availability of healthier food choices. It was therefore considered essential for FSS to keep consumers at the forefront of this new strategy and hold Government accountable for decisions which could adversely affect their interests. Respondents felt it was particularly important to ensure that EU Exit did not undermine public health policies during the critical period when Scotland is recovering from COVID-19 and its impacts on diet and health.
- There were a number of comments on learning points from Scotland's response to the pandemic that could be considered as part of this strategy. It was noted that effective engagement between producers, wholesalers, local communities, vulnerable consumers and decision makers had proven to be essential in dealing with the disruptions resulting from COVID-19 and ensuring a resilient food supply chain. However there was a view that government response had revealed a cluttered delivery landscape, and that there was scope to improve co-ordination between those responsible for managing public health incidents. Stakeholders commended FSS on the way in which it had collaborated with the food industry throughout the pandemic and felt that FSS should consider how this relationship could be strengthened to deliver our new strategy, particularly in relation to the promotion of healthier diets.
- A number of comments were made about the need for us to recognise the potential opportunities associated with EU Exit and COVID-19 in addition to the risks and challenges. In particular, consideration should be given to positive changes in consumer behaviours with regard to buying locally, following good hygiene practice and reducing food waste. FSS will need to assess whether policies developed prior to the pandemic and EU Exit continue to remain 'fit for purpose' and undertake research which enables us to understand how positive change can be maintained.

8. FSS's role in sustainability

- The majority of respondents agreed that sustainability should be a part of FSS's new strategy, and should be a consideration in all of our work, with acknowledgement that consumer interest in sustainable food supply is increasing. However, there was a shared view that the strategy lacked clarity about the role of FSS in this space and the particular issues that are most important to consumers.
- A number of stakeholders expressed caution that there were many competing interests which impacted on sustainability in the food chain, and that it was important to ensure this aspect of the strategy did not extend into areas out with FSS's remit. Stakeholders considered that whilst it was important for the strategy to take account of the wider

sustainability agenda, FSS should give priority to the matters which have the potential to directly impact on our key responsibilities with regard to food protection, diet and health. The promotion of local, seasonal purchasing, and environmental concerns including food packaging, the use of plastics and food waste were all recognised as issues that were relevant to the work of FSS. However questions were raised about reference made in the strategy to low carbon agriculture and animal welfare, for which the responsibility sits elsewhere. Questions were also raised about the role of FSS in challenging the environmental impacts of certain food production methods, with specific reference to salmon farming and game sports.

- It was recognised that there was need to better understand how sustainability affects the dietary preferences of people in Scotland and public health. A number of respondents also expressed concern that the public lacked understanding of the challenges of ensuring sustainability in food production and that it incurs a cost which is then passed on to the consumer. It was therefore considered important to ensure that drivers for sustainability are based on evidence on benefits for both the environment and consumers.
- Concerns were raised that there was a lot of misinformation about what made foods sustainable or unsustainable and that FSS could play a role in improving public understanding of this complex issue. Ensuring correct information around the sustainability of food products was considered to be critical to consumer choice, including the need for labelling which enabled consumers to compare the credentials of Scottish and imported products. Respondents highlighted the scrutiny that was placed on agriculture in particular and that it was important to recognise the progress made by producers in Scotland and that consumers were aware that the impacts of Scottish food production were not comparable to global farming systems.
- A number of respondents noted the complexity of the food system and that sustainability and environmental impact were intrinsically linked to dietary health and food security. It was therefore suggested that there was a need for a broader vision which was capable of assessing these issues holistically in order to avoid unintended consequences and ensure a sustainable food supply chain which was safe and nutritious. This was also an important consideration for the emergence of next generation food products which will require new safety and labelling standards to ensure consumers are protected from risks and that they are able to make informed choices about sustainability issues.
- Views were expressed that more research was required to improve our understanding of the interplay between sustainability, safety, authenticity, legal compliance, consumer preference, nutrition, affordability, and ethical welfare. Whilst respondents recognised that environmental issues were out with FSS's remit, it was noted that there was considerable scope for FSS to collaborate with scientific institutes, policy makers and delivery partners in Scotland to ensure consumers are well informed about the environmental impact of production and that food producers and businesses are supported in providing Scotland with the most environmentally sustainable and healthy food possible.

9. Key partnerships

- The majority of respondents agreed that the strategy reflected the key partnerships that FSS will rely on to be able to deliver its new strategy. However it was noted that strong collaboration across multiple sectors and disciplines would be essential in addressing the challenges that we will face over the next 5 years. Some stakeholders felt that the strategy

could provide a stronger commitment to the partnerships that will be most critical in delivering its key goals in relation to food safety and dietary health in addition to shared policy aims on sustainability. It was further suggested that it may be useful for work plans developed from this strategy to highlight the specific partners that it will need to work with in order to deliver its objectives.

- A number of stakeholders suggested that FSS should place more emphasis on its working relationship with food businesses and trade bodies to ensure its new strategy takes account of the commercial interests of the sector. Whilst acknowledging the need for FSS to be independent, it was considered important that we did not work in isolation, and that challenges over the next five years could only be addressed through effective collaborative working at every stage of the food supply chain. There was a shared view that our relationships with industry would become increasingly important post EU Exit and had a key role to play in evidence gathering, the development of guidance and standards and workable food safety and dietary health policies.
- The importance of partnerships with primary producers trade bodies representing the farming and fishing sectors (such as Quality Meat Scotland, Scottish Salmon Producers, Seafood Scotland, and the National Farmers Union for Scotland), are also very important to the delivery of this strategy. It was considered important that the strategy did not overlook the importance of this part of the food supply chain in controlling risks and sustainable production.
- Some respondents noted specific partnerships that would be critical to the delivery of our aim to improve the compliance of food businesses. This includes third party assurance bodies and organisations which provide learning and professional development for those working in the food industry. It was highlighted there was scope for FSS to play a more prominent role in the development of certification schemes and initiatives which sought to maintain and strengthen skills in food safety and standards across the food chain, particularly in the SME sector.
- Several responses noted the importance of FSS's future partnership with Public Health Scotland (PHS) and the need to ensure there was clarity around the respective roles of PHS and FSS with regard to diet and nutrition. Concerns were also raised about the impact of changes to the delivery of functions previously carried out by Public Health England (PHE) on a UK basis, and the potential loss of momentum and independent oversight of interventions for improving dietary health. It was considered important for FSS to work closely with the new organisation(s) that will take over these functions to ensure Scottish interests continue to be effectively represented in UK public health policy and support the monitoring of targets.
- Respondents recognised that the strategy referred to UK Government as a key partner but noted that it may be useful to define the key departments that FSS will need to work most closely with throughout the delivery of this strategy, for example The Department of Health and Social Care (DHSC) and Department for Environment, Food and Rural Affairs (DEFRA). The importance of FSS's working relationship with the Animal and Plant Health Agency (APHA) was also highlighted, with particular regard to our veterinary functions.
- Reference to the particular importance of LAs in helping FSS to deliver the vision, outcomes and goals of this strategy was welcomed. However it was noted that this extended beyond food and feed law enforcement, and that it was also important to acknowledge the role of the public sector in the procurement of food and drink, which

served some of the most vulnerable in society through care home and school meals provision. This LA function had a significant influence over Scotland's food culture and environment, and supported the delivery of effective dietary health intervention through schemes such as The Food for Life Scotland programme which certifies over half of Scotland's school meals services to ensure that the food served is fresh, sustainable, safely prepared and locally sourced. Concerns were raised over the on-going financial pressures placed on public sector catering and there was a view that advocating for improvements to public sector food provision (in schools, hospitals and prisons) would align with the vision, goals and objectives of the FSS strategy.

- Respondents agreed with the emphasis on international partnerships, noting the importance of setting new (post EU Exit) relationships with the European Food Safety Authority (EFSA) and establishing stronger links with academia and international food bodies. These partnerships were viewed as being critical in enabling FSS to build an evidence base and policy framework which took account of best practice from around the world. One respondent felt that FSS would also benefit from having a more formal role in international consortia which lead research and development in areas such as One Health and Antimicrobial Resistance (AMR).
- Respondents noted a number of important partnerships that were missing from the strategy. In particular, it was felt that there was insufficient focus on those involved in education and engagement in schools. Whilst it was recognised that FSS already worked with Local Authorities and the Curriculum for Excellence in this regard, other partners were identified that could help to improve our engagement with young people. This includes Social Services, and organisations such as the Royal Highland Education Trust (RHET) and the Scottish Schools Education Research Centre (SSERC). It was also noted that the SEFARI research institutes produce educational resources on nutrition, food safety and sustainability.
- In addition, there was a shared view that there was scope for FSS to build stronger working partnerships with the third sector, not for profit organisations and community groups. Whilst reference to third sector bodies was welcomed, respondents noted that the strategy lacked detail on how these partnerships would support the delivery of our strategy through data sharing and interventions which could help us to engage more effectively with hard to reach groups in society.

10. Challenges and risks to delivery

- The majority of respondents highlighted EU Exit as being the most significant challenge for FSS over the next five years. There was support for the UK Common Framework approach, but concerns were expressed regarding the politicisation of food policy and regulation and the impacts of the Internal Market Bill. There was a shared view that the broader political environment could impact on all areas of FSS's work and hamper key progress made in relation to dietary health and food safety. Uncertainty around trade agreements was also considered to present a risk to the strategy, and respondents questioned FSS's capacity to manage increasing demands relating to new requirements export markets and the potential risks to the safety and standards of our food chain resulting from imported products.
- It was also noted that delivery of this strategy would be subject to external factors over which FSS would have little control. Respondents cited the introduction of new support frameworks to replace the Common Agricultural Policy, and financial recovery from the

COVID-19 pandemic as key issues that are likely to impact on delivery. There were concerns that whilst the consequences are still largely unknown, these issues could have a significant impact on our food supply chain and threaten the vision for our strategy, by taking resource away from the delivery of our key goals. There was therefore a view that the strategy should more strongly reflect the need for FSS to be resilient and adaptable to ensure it is able to identify and deal with the emerging risks and conflicting priorities that are likely to arise over the next 5 years.

- The economy was considered to be a particular risk to delivery, particularly with regard to public sector resources, which respondents felt should be given more prominence in the strategy. It was acknowledged that the document noted the risks associated with cuts to Local Authority budgets, but questions were raised about how increasing pressures on the public sector would affect FSS, and our ability to recruit staff with the necessary skills to carry out our responsibilities effectively. Coupled with the impacts of financial pressures on consumer purchasing and the structure of the food industry, questions were raised as to whether FSS and LA delivery partners would have sufficient resources to keep pace with the rapid changes and be capable of achieving all of the goals outlined in the strategy. Strong partnership working and new models for funding official controls were also highlighted as potential solutions for mitigating these risks.
- With regard to the strategic goals, a number of respondents highlighted that promoting behaviour change would present increasing challenges for FSS in delivering this strategy. There was a perception that low levels of public understanding about the food chain in general had created a level of illiteracy regarding dietary health and food safety, which has been compounded by the volume of misinformation on food promoted through main stream and social media. Respondents indicated that this would need to be addressed through more effective use of social sciences to properly understand how consumers respond to information and the factors which impact on their behaviours. They also noted that FSS should consider new approaches for engaging with the public as part of this strategy, focussing on education and community based activities which covered all parts of society including deprived communities and hard to reach groups.
- The impacts of environmental policies on food safety and diet featured in a number of responses, noting that this was an area that FSS would need to monitor carefully throughout the duration of this strategy, particularly in relation to new farming and production methods relating to green recovery and the circular economy (e.g. how the use of manures and recycled waters could impact on the transmission of foodborne pathogens and contaminants). A number of respondents welcomed reference to horizon scanning in the strategy, but noted that this is a challenging field, and it will be essential for FSS to have appropriate expertise and resources to be able to identify emerging food safety risks associated with food and feed imports post-EU exit, and the potential effects of climate change.
- Several respondents noted that although e-commerce has been identified as a challenge for FSS, it presents a huge opportunity for Scottish food businesses. It was also noted that emerging technologies should not be considered as a risk as they had the potential to make products safer and healthier.

11. Addressing health inequalities

- Reducing health inequalities in relation to food was recognised to be one of Scotland's most significant challenges, which has been further exacerbated by the Covid-19

epidemic. Respondents agreed that FSS had a key role to play in supporting wider policy aimed at ensuring consumers were not priced out of a healthy and safe diet, and that this should be more clearly articulated throughout the strategy.

- Respondents also acknowledged that reducing health inequalities was a multifaceted societal issue extending beyond FSS's remit and can only be addressed through effective partnership working, both in terms of research to improve understanding of the causes of dietary inequalities, and in the development of interventions for addressing them. It was suggested that the strategy should give more prominence to partnership working with Public Health Scotland, community groups and third sector organisations in this regard.
- The role of education was highlighted as having an important role to play in enabling those in more deprived areas of Scotland to connect with the food environment, learn cooking skills and make more informed choices about diet. A number of respondents noted that there should be more focus on working with educators and community groups to promote knowledge and understanding across all parts of society.
- Concerns were raised about the influence of the food environment on dietary health in Scotland, with reference to the proliferation of fast food outlets in more deprived areas of the country and the potential impacts of cheap imports on inequalities post EU Exit. There was a shared view that supporting wider Government strategies aimed at promoting the availability of locally sourced, affordable food would provide FSS with a means of demonstrating its commitment to reducing health inequalities and sustainability.
- Some respondents highlighted the need for FSS to consider the impact of dietary inequalities more widely across society, taking account of factors such as mental health and the particular food preferences and health issues affecting BAME (Black, Asian, and Minority Ethnic) communities in Scotland. It was also noted that the Strategy referred to the 'Scottish diet' as a single entity, but in reality this was a diverse concept, and there was therefore a need for FSS to assess what this looked like in terms of age, gender, race and health status in addition to economic factors.