

Food Standards Scotland

Strategic Plan

April 2016 – March 2019

DRAFT

The primary concern of Food Standards Scotland (FSS) is consumer protection – that food is safe to eat, ensuring consumers know what they are eating and improving nutrition.

The objectives of FSS as set out in the Food (Scotland) 2015 Act are to:

- Protect public from risks to health which may arise in connection with the consumption of food
- Improve the extent to which members of the public have diets which are conducive to good health
- Protect the other interests of consumers in relation to food

FSS's Strategy to 2021 sets out our vision - to deliver ***a food and drink environment in Scotland that benefits, protects and is trusted by consumers.***

This Strategic Plan sets out the key activities that we will undertake to March 2019 to help us move towards this vision, through an outcomes based approach.

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Outcome 1 – Food is Safe

Why this matters

Food safety is at the heart of what FSS does. In Scotland, it is estimated that there are approximately 43,000 infections, 5,800 GP visits and 500 hospital admissions caused by food borne diseases annually¹.

There are a number of foodborne pathogens that can cause human illness, and we will work collaboratively with others, including through the Scottish Health Protection Network and with the Food Standards Agency (FSA) in the rest of the UK, to reduce the risks to consumers. Reducing foodborne illness from Campylobacter is an early priority for FSS. We know that around three quarters of fresh chickens sold by major retailers in the UK are contaminated with Campylobacter², and we have evidence that between 60-80% of all reported cases of Campylobacter infection in Scotland are associated with a chicken source.

FSS runs an programme of official controls related to the production and harvesting of wild and cultivated shellfish. This is a resource intensive programme of work, reflecting the scale of the industry in Scotland and its importance not just in Scotland but through exports to other parts of the UK and beyond. We will review this programme, ensuring that protecting public health remains our key objective.

We also need to help ensure that consumers understand where they have responsibility for storing, handling and preparing food safely and what they should do to protect themselves and others for whom they prepare food.

Responding effectively to food and feed incidents is an essential part of our business. Food and feed incidents have the capacity to affect consumers through microbiological, chemical or physical contamination of the food chain, so ensuring that we have an effective capacity in incident response, testing this through regular exercises and working collaboratively with a wide range of others will be an essential part of our role in protecting public health.

¹: <http://www.foodstandards.gov.scot/food-safety-standards/foodborne-illness>

² <http://www.food.gov.uk/news-updates/news/2015/13970/up-to-one-third-of-people-at-risk-from-campylobacter-food-poisoning-during-their-lifetime>

Outcome	Key Activities
Food is safe	<p>Agree and implement a Foodborne Illness Strategy for Scotland, focussed on key transmission pathways that contribute to infectious intestinal disease (IID) in the Scotland population.</p> <ul style="list-style-type: none"> • Focussing FSS’s research programme to understand the key transmission routes for Campylobacter in Scotland and the contribution of Scottish produced poultry, and work collaboratively with the Food Standards Agency on the UK Campylobacter programme • Leading delivery of relevant parts of the Scottish Government’s VTEC/E. coli O157 Action Plan for Scotland. • Working with others through the Scottish Health Protection Network to find collaborative solutions for reducing the risks of IID across all of the potential transmission pathways. • Empowering consumers with the knowledge they need to make safe food choices, and undertake safer food practices – ensuring they understand and can meet their responsibilities. <p>Through engagement and consultation, construct, implement and then review performance of an improved model for delivery of animal feed official controls in Scotland that is effective in protecting feed and food safety.</p> <p>Carry out a comprehensive review of the FSS shellfish monitoring programme, including small scale and local supply chains, working in partnership with others including Marine Scotland.</p> <p>Ensure that FSS and local authorities have effective programmes of official controls to verify that food businesses are meeting their responsibilities to deliver safe food.</p> <p>FSS responds effectively to food incidents that could affect food safety, and regularly exercises its incident response capacity and effectiveness.</p>

Outcome 2 – Food is authentic

Why this matters

Consumers need to have confidence that the food they buy and eat is what they expect it to be. In the broadest sense, the term 'food standards' includes food labelling, food composition, food authenticity and the nutritional quality of food. Food offered for sale should be of the nature, substance and quality expected by the purchaser.

The horsemeat incident of 2013 showed clearly how consumer confidence was undermined when they were misled about their food. The Scottish Government responded robustly to that incident, and the report from the Scudamore Expert Advisory Group³ highlighted the importance of providing clearer information to consumers about the composition of their food and where it comes from. In responding to that report, the Scottish Government and the FSA acknowledged that the incident highlighted a number of issues to be addressed to restore consumer confidence. These ranged from the need to develop a better understanding of the supply chain, improved surveillance, the capacity to investigate and deal with food fraud and improved communications and consumer engagement.

In creating Food Standards Scotland, the Scottish Government was clear that in light of the horsemeat incident, it wanted to more closely align food information powers with existing food safety powers, so delivering this is a priority for us. So whilst recognising that food safety is a priority in public health protection, we will also prioritise work to protect consumers' interests that food is what it says it is, and to ensure that consumers can have confidence in making informed choices.

And as with food safety, consumers also have responsibilities in making food choices, so we will carry out activities to help consumers understand what food labels mean, and what they should expect food businesses to tell them about the food they buy.

³ <http://www.gov.scot/Resource/0042/00426914.pdf>

Outcome	Key Activities
Food is authentic	<p>Fully implement the recommendations on the Scudamore Expert Advisory Group, including;</p> <ul style="list-style-type: none"> • Finalise and implement new food surveillance and sampling strategy for Scotland, and ensure effective capability to tackle food crime • Identify and prioritise new research requirements on food authenticity • Carry out stocktake of laboratory provision in Scotland for authenticity testing and development of associated guidance for LAs and food businesses • Establish an effective Scottish Food Crime Unit through a phased approach • With the FSA's Food Crime Unit, develop a Strategic Risk Assessment for the UK • Agree priority partnerships arrangements in relation to food crime, and develop information sharing protocols <p>Develop proposals and implement action to align the priority of food information official controls more closely with food safety equivalents.</p> <p>Through a mix of engagement, communication and marketing activities, help consumers to understand food labels, and help empower them in making confident, informed choices.</p> <p>Working with Scottish Government, review food labelling responsibilities to ensure that consumers' interests in food information are protected, and that consumers have access to clear and accessible advice on food labelling.</p>

Outcome 3 – Consumers choose healthier diets

Why this matters

The Scottish Government is committed to ensuring people in Scotland live longer, healthier lives. Poor diets are one of the most significant causes of ill health in Scotland and are a major factor in obesity. Scotland is positioned near the top of the league tables for obesity among OECD countries, and has one of the highest prevalence rates of overweight and obesity in Europe⁴. Almost two thirds of adults in Scotland are either overweight or obese, and progress in meeting the Scottish Dietary Goals is very slow⁵.

Health outcomes related to poor diet are well known – overweight and obesity contributes to higher risk of heart disease, stroke, Type 2 diabetes and some cancers. The Scottish Government's Obesity Routemap⁶ estimates that the direct NHS Scotland costs of obesity will almost double by 2030, and could rise to as much as £3 billion.

By widening the remit of FSS and providing a specific statutory objective in relation to diet, Scottish Ministers have set out their ambitions for change, and we will work closely with others to help drive this change.

We know that many people find it challenging to make long-term changes to their diets that will reduce the likelihood of overweight and obesity and the associated health risks. Rebalancing the diet is a shared responsibility – shared between individuals, communities, the food and drink industry and Government, so we will work across this spectrum to encourage, influence and enable people to make healthier choices.

⁴ <http://www.oecd.org/els/health-systems/Obesity-Update-2014.pdf>

⁵ <http://www.foodstandards.gov.scot/monitoring-progress-towards-scottish-dietary-goals-2001-2012-report-2>

⁶ <http://www.gov.scot/Publications/2010/02/17140721/0>

Outcome	Key Activities
<p>Consumers choose a healthier diet</p>	<p>Create an authoritative, primary source of evidence-based diet and nutrition advice about diets conducive to good health, to support the Scottish Dietary Goals.</p> <p>Monitor and report progress towards meeting the Scottish Dietary Goals, using new tools for dietary surveillance – incorporate ‘Intake 24’ into Scottish Health Survey. .</p> <p>Through partnership working, develop and implement plans to provide strategic co-ordination of Scottish Government-funded diet and nutrition research and surveillance, to help ensure the effective use and application of resources in Scotland.</p> <p>Working with partners, including the food and drink industry, to create a healthier food and drink environment in Scotland. This will include:</p> <ul style="list-style-type: none"> • Reviewing progress with <i>Supporting Healthy Choices</i> and developing recommendations for future actions. • Working with local authorities and businesses to deliver the catering elements of <i>Supporting Healthy Choices</i> <p>Lead the development of a set of dietary guidelines for Scotland.</p> <p>With others, take forward agreed actions to implement the 2015 SACN Recommendations on dietary carbohydrates.</p> <p>Through co-created diet related campaigns, build an assets-based approach for behaviour change that enables and supports the role of people and communities in dietary health improvement.</p>

Outcome 4 – Responsible food businesses flourish

Why this matters

FSS's primary concern is consumer protection - that food is safe to eat, ensuring consumers know what they are eating and improving nutrition. A thriving, compliant food and drink industry is good for consumers as well as being good for business.

Scotland's first food and drink policy - A Recipe for Success – was indeed successful. Between 2008 and 2012, Scotland's food and drink manufacturing turnover growth increased by 20.8 per cent. Scottish food exports in 2014 were worth £1.1 billion – up 57 per cent from 2007. And ambitions remain high – there is a priority to increase Scotland's food and drink sector turnover to £16.5 billion by 2017, with the strategy for growth being focussed on market opportunities around premium, provenance, health and environmental sustainability. And an Export Strategy Plan was launched in 2014 that involves a £4.5 million investment over five years.

The food and drink sector in Scotland is clearly thriving and Scottish produce has a strong reputation both at home and abroad. In our regulatory capacity, FSS has a key role to play in ensuring that strong reputation continues to be well founded, and that consumers no matter where they live can buy, eat and drink Scottish products in the confidence that they are safe and what they say they are.

It is the responsibility of food businesses to produce safe and accurately described food. Our role as regulator, working closely with local authorities, is to ensure that businesses meet these responsibilities, and to take effective action when they fail to do so. And we have a role in helping consumers understand how businesses are performing and how they can use information about compliance to make informed choices.

Outcome	Key Activities
Responsible food businesses flourish	<p>Develop a regulatory strategy for FSS that protects consumers, enables responsible businesses to flourish and deals effectively with businesses that do not meet their responsibilities.</p> <p>Work with other organisations to reduce unnecessary or disproportionate regulatory burdens across the supply chains and to enhance risk-based approaches to compliance, in line with the requirements of the Strategic Code of Practise for Scottish Regulators.</p> <p>In collaboration with local authorities and in consultation with consumers and industry, implement the recommendations of the review of the operation and presentation of the Food Hygiene Information Scheme (FHIS), to incentivise business compliance and influence consumer choice.</p> <p>Support Scottish food and drink exports through expert assistance with inwards visits by third countries, and providing advice on compliance requirements to businesses.</p> <p>Develop a consistent approach to the approval of premises that produce foods of animal origin.</p>

Outcome 5 – FSS is a trusted organisation

Why this matters

This matters fundamentally to us, as FSS's stated vision is to deliver ***a food and drink environment in Scotland that benefits, protects and is trusted by consumers***. To earn that trust, we need to do the right things, and do things right. We've already said that our primary concern is consumer protection - that food is safe to eat, ensuring consumers know what they are eating and improving nutrition. So we need consumers to trust us in how we do this on their behalf. We need to build our reputation with people in Scotland, ensuring people know who we are, and earn their trust through being a consistent and authoritative voice on food issues.

We also know that there are other issues that affect and concern consumers in relation to food, and we have a statutory objective to 'protect the other interests of consumers in relation to food'. To earn and keep the trust of consumers, we need to understand what these other interests are, and be clear where we can exert influence either directly or through others for the benefit of consumers. This will require us to engage with and involve people and partners in our work, building on our previous approach within FSA, and to take forward an approach that focuses our activities on achieving real and lasting benefits for people.

We also need to earn the trust of those that we regulate, and the activities described in relation to Outcome 4 in particular will be a major part of this.

Outcome	Key Activities
FSS is a trusted organisation	<p>Carry out a programme of both general and targeted engagement with citizens, involving outreach through public and community events, and more targeted engagement on specific issues e.g. through citizens' forums.</p> <p>Deliver a communications and marketing strategy that engages and empowers consumers, and assures them that we are working on their behalf on food safety, food information and enabling healthier choices, and embeds FSS as a visible, recognisable and trusted brand.</p> <p>Working with consumers to identify their '<i>other interests in relation to food</i>' and assessing where and how we can best influence these.</p> <p>Through collaborative working with others, e.g. NHS Health Scotland, support and encourage community based approaches to health improvement in relation to food.</p> <p>Develop our website to become a transparent 'one stop shop' food related public health issues.</p> <p>Contribute to the Scottish Government's work to make Scotland a Good Food Nation.</p> <p>Ensure that consumers and stakeholders are engaged at the earliest possible stage in policy development, and that their voices are heard.</p> <p>Carry out a programme of stakeholder engagement on both general and specific issues, including stakeholder forums.</p> <p>Continue our organisational development, so that our workforce is recognised as skilled and capable, thereby earning the trust of the public, our partners and of stakeholders, and that FSS becomes recognised as great place to work, with high levels of staff engagement.</p>

Key Enablers

The activities outlined above represent an ambitious and challenging programme of work for a relatively small organisation. To be successful, we will need to 'punch above our weight' and build effective and meaningful partnerships with others, where this will help us deliver more for the people of Scotland.

Outlined below are 'key enablers' that will be needed to support us in how we deliver our work.

Our Approach to Evidence – developing a **science and evidence strategy** for FSS that supports our evidence requirements. This will direct how we identify and prioritise our evidence needs, ensuring that these support our strategic priorities, and how we work with others on science and evidence.

Openness and Engagement – a strategic approach to **communication**. FSS will build on the FSA's approach to openness and will align with the Scottish Government's ambitions to focus more on engaging and empowering communities and people.

How we Regulate – we will undertake a fundamental review of how we fulfill our **role as a regulator**. This will allow us to take a strategic view on how our regulatory role can deliver the best outcomes for consumers whilst supporting responsible businesses.

Partnership and Collaboration – we will achieve more benefits for consumers when we develop **meaningful and effective partnerships**. We will build on the collaborative relationships we already have with a large number of other organisations, and seek to develop new partnerships where these will bring greater benefits for consumers.

People and Skills – the most valuable asset of our organisation is our people, so **investing in their development** is essential to maximise our collective effectiveness. We need to have the right people with the right skills in the right place to deliver the outcomes we seek for the people of Scotland.

How we Work – ensuring that our corporate services support and enhance what we do, enabling us to work smarter and more efficiently, allowing us to focus on doing the things that will make a difference for public health, improved diets and the other interests of consumers.