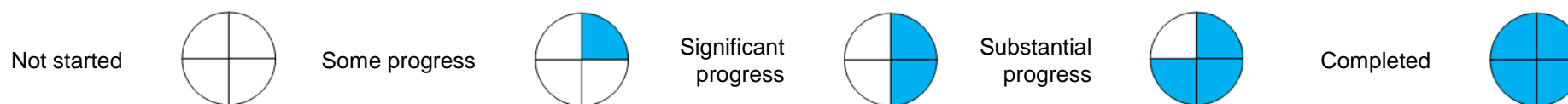


ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

Table A1 below provides a brief update on progress with each recommendation of the Scudamore Expert Advisory Group (Scudamore recommendations).

A guide to progress as assessed by FSS officials is provided against each recommendation in a graphical format representing five indicative progress categories as follows:




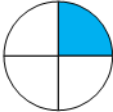
A summary of progress against each of the workstreams is set out in the main paper, Figures 1 and 2.

Table A1: Progress against objectives for each recommendation (Rec), grouped by workstream (WS) and ordered by recommendation number within each workstream. The columns from left to right represent respectively:


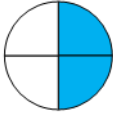
1. The recommendation number followed by the workstream number along with the overall progress indicator for work to meet the recommendation.
2. The relevant Scudamore recommendation
3. The response jointly agreed by the FSA and Scottish Government relating to the recommendation published in November 2013.
4. Any extension that FSS has applied to the jointly agreed objectives and where practicable an indication of the expected time to completion.
5. A summary of progress to date.

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES


Table A1

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|---|--|--|
| Workstream 1 Surveillance Strategy | | | | |
| 8/1  | The New Food Body should continue to be involved with the Food Fraud Advisory Unit and share information with the Food Fraud database. | The Scottish Government agrees that FSS should continue the working relationships developed by staff in Scotland with the FSA Food Fraud Unit after Vesting Day and will seek to ensure that this relationship will be included in the Memorandum of Understanding between the FSS and the FSA | FSS will manage an effective and integrated intelligence collection and analysis facility in Scotland which works collaboratively with UK wide systems. Food Crime Strategic assessment to be completed during Q4 of 2015/16 | The Memorandum of Understanding (MoU) and working level arrangements between the FSS and the FSA include agreements that FSS and FSA will continue to work together and share information with the Food Fraud database. FSS is currently working with FSA on the production of the first UK wide Food Crime Strategic Assessment. Once this has been published, FSS will develop its own control strategy, which will highlight Food Crime priorities for Scotland, and its own delivery plan which will be used to guide the work of the FSS Food Crime Unit once created. |
| 12/1  | The New Food Body should consider how to improve the use and collation of information across food standards and food safety to ensure Scotland has a world recognised surveillance system in place | At the request of Scottish Ministers the FSA has commenced the development of advice on what a world recognised surveillance system would look like and FSS will continue to prioritise this work in line with available resources post Vesting Day. The FSA will produce a progress report on its work on what a world class surveillance system would | FSS will develop a food surveillance strategy for Scotland which will incorporate methods for horizon scanning and identifying emerging risks that have been recognised as best practice internationally. FSS plans to present a Scottish food surveillance strategy to the FSS board during Q4 of 2015/16, which | In October 2015, FSS will publish the report of research contracted to ICF International to benchmark Scotland (and the rest of the UK) against countries that have the best performing food surveillance systems. On 17 July 2015, FSS held a food and feed surveillance strategy workshop with FSA at which both parties discussed the guiding principles of a UK surveillance strategy and future collaboration between FSS and FSA on intelligence sharing. Work will commence during Q3 of 2015/16 on the drafting of a food surveillance strategy for FSS |



ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|--|---|--|
| | | look like by April 2014. | will be implemented during 2017/18. | based on the recommendations made in the ICF report and discussions with FSA. |
| 17/1  | <p>The New Food Body should develop annual monitoring programmes for Scotland in collaboration with the local authorities covering a diverse range Food Safety and Food Standards issues.</p> | <p>Prior to Vesting Day the FSA will work towards agreeing annual Scottish monitoring plans through collaborative work with local authorities and SFELC. This will include greater targeted sampling based on a review of existing datasets and using available enforcement and other intelligence sources to target activity. A Scottish programme will take account of baseline standards set for sampling across the UK. The Scottish Government agrees that FSS should continue this post Vesting Day.</p> | <p>FSS will develop and manage annual programmes of nationally coordinated risk-based sampling covering UK wide and Scottish priorities relating to food safety and standards.</p> <p>Co-ordinated local authority sampling programmes will be commissioned annually.</p> | <p>FSS agreed a food sampling strategy with SFELC during 2013/14 which takes account of UK wide priorities identified in collaboration with FSA and trends and emerging issues from UKFSS data, incidents, research and LA intelligence. The first sampling programme to be developed through this strategy was taken forward in 2014/15.</p> <p>On 1 April 2015, FSS took over the central co-ordinating role for all LA food sampling grants in Scotland, and awarded £201,000 to support sampling during 2015/16 across a range of UK and Scottish priorities relating to food safety and authenticity. This work was previously funded through a combination of grants awarded to Scottish LAs by FSA and FSAS.</p> <p>Future programmes will be developed in the same way and refined to take account of other intelligence sources as they become available through the FSS surveillance strategy.</p> |
| 18/1  | <p>The New Food Body could implement additional surveys across a range of foodstuffs, such as the survey on the</p> | <p>The FSA in Scotland will commence this work before Vesting Day and the Scottish Government agrees that it should be continued by FSS. For</p> | <p>On an annual basis, FSS will review evidence from research, surveys and risk assessment to identify requirements for additional targeted surveillance</p> | <p>Since 2013, FSA has employed Stable Isotope Ratio Analysis (SIRA) to assess country of origin labelling claims on a range of products sampled at retail.</p> <p>FSAS/FSS has also funded research to investigate</p> |

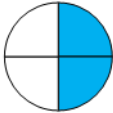
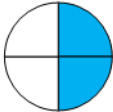
ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|--|---|--|
| | authenticity of meat products as an example based on risk assessment and general intelligence. | example, the FSA is currently commissioning a programme of sampling of beef for isotope profiling and a national survey of fish authenticity. FSS will keep its food surveillance under review and commission additional surveys based on risk assessment and intelligence post Vesting Day. | projects to supplement intelligence from LA sampling programmes. | the use of SIRA as a means of confirming the provenance of Scottish beef. An additional surveillance project was funded by FSS during FY 2014/15 to determine the extent of fish species substitution in products sampled from public sector organisations. These projects are due to report during Q3 of 2015-16. FSS will review requirements for additional surveillance projects to be commissioned in 2016/17 as part of its evidence prioritisation exercise to be undertaken during Q4 of 2015/16 |
| 19/1  | The New Food Body should develop a risk assessment strategy for food safety and standards. This should ensure the development of Scottish capacity and expertise in horizon-scanning including economic analysis as well as speculatively looking for potential areas of risk, rather than just following an intelligence-led approach. | In response to the Troop report, the FSA is improving its collation and analysis of intelligence by formation of an Intelligence Hub by December 2013. The FSA and the Scottish Government agree that FSS should have access to capacity and expertise in horizon scanning and this will be considered during the transition to establish FSS. A research project, due to report April 2014, has been commissioned by the FSA to develop a risk- | FSS will develop a risk assessment framework as part of its food surveillance strategy. This will include a horizon scanning approach which takes account of a range of intelligence sources, including economic data to identify emerging food safety issues and potential areas for food fraud. A food surveillance strategy for Scotland will be presented to the FSS board during Q4 of 2015/16, and | Since 2013, FSAS/FSS has been exploring access to expertise in intelligence, risk assessment and economic analysis, and has identified areas where it will be necessary to recruit additional expertise or procure services from external sources, including collaborative working arrangements with FSA, Scottish Government and academics. During 2015/16, FSS will identify the need for dedicated staff and the necessary working level agreements and contracts which will be required to supplement its existing complement of scientific and statistical expertise required to support risk assessment. This will be taken into account in the development of a food surveillance strategy for FSS which will be presented during Q4 of 2015/16. |

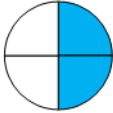

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|--|---|--|--|
| | | based sampling method for local authorities and to look at how FSA data systems could be used by the FSA to assess risk. | implemented during 2017/18 (see recommendation 12) | |
| 23/1  | The Scottish Government and the FSA Scotland should ensure the remaining 3 local authorities in Scotland participate fully in the UKFSS. | The 3 local authorities in Scotland not currently using the UKFSS have agreed in principle to start using the system following a period of staff training. The FSA is currently in a position to provide training to local authorities and will now make arrangements with each authority to meet individual needs. | <p>FSS will ensure all Scottish LAs submit details of food sampling activity to UKFSS and any future systems intended to centrally record details of food sampling undertaken in Scotland.</p> <p>By 31 December 2015, all Scottish LAs will be participating in UKFSS</p> | <p>29 out of the 32 LAs in Scotland have been fully participating in UKFSS since 2005. A further 2 LAs (Inverclyde and North Lanarkshire) came on board in 2013, and the final LA (South Lanarkshire) has given its commitment to start using the system during Autumn 2015.</p> <p>FSS will work closely with LAs and Public analysts on the development of new IT systems for central recording of LA sampling data to ensure on-going commitment to data sharing and reporting.</p> |
| 24/1  | The New Food Body should ensure that Local authorities in Scotland continue to participate in the UKFSS. | The Scottish Government agrees that all Scottish local authorities should continue to participate in the use of this important data gathering tool. | <p>FSS will ensure all Scottish LAs continue to participate in UKFSS and any future systems intended to centrally record details of food sampling undertaken in Scotland.</p> <p>This work is on-going</p> | <p>FSS has continued to promote LA use of UKFSS for routine recording of food sampling data through the production of annual reports, on-going IT support and training.</p> <p>This support will continue as FSS develops its new IT strategy for collecting LA data.</p> |
| 33/1 | FSA Scotland and the Scottish Government | The Scottish Government welcomes the | FSS will work with laboratories and others to | Since 2013, FSS has been working with Shared Scientific Services Project Board (led by |

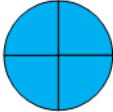
ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|--|---|--|
|  | <p>must urgently identify the scientific capacity and capability it would require to deliver official controls in the future, so that decisions could be made about what needed to be available in Scotland and what needed to be available elsewhere. This should then be used to inform more strategic investment decisions.</p> | <p>recommendation and will work with the FSA to deliver the recommendation. The FSA has agreed to join the Scottish Shared Scientific Services Steering Group to ensure that the potential requirements for Official Controls on food will be incorporated into any shared service proposals for Scotland that may emerge in the future.</p> | <p>ensure that Scotland has an integrated laboratory infrastructure equipped to provide the range of tests and scientific advice required to meet current needs and to adapt to meet foreseeable needs.</p> <p>FSS will complete a review of analytical provision for food and feed testing in Scotland by 31 March 2016. This will take account of findings of the review of scientific services in Scotland and consultation with other stakeholders with an interest in centralised laboratory facilities.</p> | <p>Improvement Services Scotland) to identify where there is scope to strengthen and improve co-ordination of current analytical services for official controls on food safety and standards. This input has been used to develop a business case for a new model of analytical services which is expected to be completed by Autumn 2015.</p> <p>FSS has also engaged other Scottish Government and NHS partners to explore the potential to create an aspirational model for integrated veterinary, food, water, environmental and clinical surveillance and monitoring in Scotland. A letter was sent to interested parties in July 2015 to seek interest in participating in further discussions during autumn 2015.</p> |
| <p>40/1</p>  | <p>FSA Scotland and the New Food Body should determine the sample basis of any surveillance in order to provide statistically significant result.</p> | <p>The FSA will continue to factor in statistical significance to all surveillance sampling under its control when appropriate and will provide support and advice to local authorities on surveys commissioned by local authorities. The Scottish Government</p> | <p>FSS will ensure that statistical significance is taken into account in the design of all food surveillance programmes in Scotland.</p> <p>This work is on-going.</p> | <p>Statistical significance has always been a prerequisite of FSAS/FSS funded surveillance work.</p> <p>Since 2013/14, FSS has also recommended sample numbers for LA sampling based on recommendations from UKFSS reports and for the purposes of the co-ordinated food sampling grants programme.</p> |

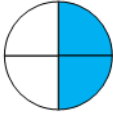
ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|--|---|---|---|
| | | expects this to be continued by FSS. | | |
| 41/1  | The New Food Body should ensure a co-ordinated sampling programme is in place across Scotland, with local sampling plans complementing Scotland and UK-wide sampling activity. | Prior to Vesting Day the FSA in Scotland will ensure that a co-ordinated national sampling programme is in place, continuing to collaborate with local authorities through SFELC to work towards a Scottish monitoring programme. It will work towards greater targeted sampling based on a review of existing datasets and using available enforcement and other intelligence sources to target activity. FSS will continue this post Vesting Day. | See response to Recommendation 17. | See response to Recommendation 17. |
| 42/1  | The Scottish Government, the FSA Scotland and the New Food Body should ensure Food Business Operators share the detail and the results of their testing programmes in | The FSA has commenced a programme of work to increase information sharing opportunities with industry, delivering the initial project by March 2014 as outlined in the response to recommendation 1. Scottish Government will | FSS will engage with the food industry to develop protocols and mechanisms which will facilitate the sharing of intelligence on food safety and authenticity in Scotland. This work is on-going. | Initial discussion with food retailers suggests industry will work with FSS on proposals for disclosing testing results to FSS. FSS is working with industry to devise a disclosure scheme which will allow FSS to make use of a wider set of data and help industry share best practice and reduce costs arising from duplication of effort. The potential for developing a project for improved data sharing is being explored which could be taken |



ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|---|--|---|
| | Scotland with FSA Scotland. | consider in consultation with FSA whether additional powers should be included in the FSS Bill. | | forward during 2016/17. |
| 43/1  | FSA Scotland and the New Food Body should ensure that the Scottish Food Enforcement Liaison Committee publishes annual reports of UKFSS information relevant to Scotland within 6 month of the year end and contributes to the identification of priorities for surveillance of food safety and food standards in Scotland. | Prior to Vesting Day the FSA will support SFELC to ensure a timely publication of annual reports. Post Vesting Day FSS will review the reporting arrangements for surveillance data | FSS will ensure timely annual reporting of UKFSS data trends to LAs in Scotland to enable trends and emerging issues to be taken into account in food surveillance programmes. | Annual reporting of key findings from UKFSS by SFELC has taken place since 2013, with each report approved by SFELC in December of the reporting year. These reports include recommendations for LAs to adopt in order to improve surveillance sampling in areas identified through review of the UKFSS data along with other sources of information that are available to FSA and LAs. The reports are circulated to all Scottish LAs within 6 months of the reporting year end (December) in order to allow the priorities to be included in the sampling programmes for the subsequent financial year. |


Workstream 2 Testing Methods for Food Authenticity

| | | | | |
|--|--|---|--|---|
| 31/2  | The New Food Body should continue to participate actively in groups established by DEFRA and FSA to develop methods for testing food for | The Scottish Government agrees that partnership working with the FSA and DEFRA will be important for FSS and expects working arrangements for participation in authenticity | FSS will ensure that it is actively involved in UK strategies relating to the development of methods for food authenticity testing. From 1 April 2015, FSS will | The next food authenticity steering group is due to meet on 11 September 2015. FSS will continue to engage this Group to ensure accredited methods used in Scotland for authenticity purposes are comparable to the rest of the UK. |
|--|--|---|--|---|

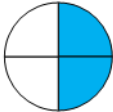
ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|--|---|--|--|
| | authenticity. | method development to be formalised through appropriate agreements before Vesting Day. | ensure that it is formally included in Defra's food authenticity steering group. | |
| 32/2  | FSA Scotland should encourage Food Business Operators to use standardised approved tests for adulteration of produce throughout the food chain. | The FSA will work with industry to encourage best practice in relation to testing for adulteration of produce. | <p>FSS will work with commercial laboratories to facilitate and encourage testing of food products by businesses in Scotland is undertaken using standardised, accredited methods.</p> <p>This work will be on-going. A review of current testing provision will be undertaken during 2015/16, and consideration given to the development of guidance in this area during 2016/17.</p> | <p>FSS has conducted a review of current testing methods used in Scotland by commercial and official laboratories, their accreditation status and which are the most commonly used methods. This review has identified that fully accredited commercial testing services for meat and fish speciation are available in Scotland.</p> <p>During 2015, FSS started a programme of engagement with commercial laboratories in Scotland to promote a common understanding of testing requirements for food authenticity.</p> |
| 34/2  | FSA Scotland should work with FSA to confirm that testing carried out on behalf of food authorities is undertaken consistently using accredited methods. | The FSA agrees that local authorities should use accredited methods where they have been developed whilst recognising that non-accredited screening tests may be useful in determining whether further laboratory testing by an | FSS will ensure that official testing of food products on behalf of authorities in Scotland is undertaken using standardised, accredited methods where they have been developed whilst recognising that non-accredited screening tests | <p>FSS has conducted a review of current testing methods used in Scotland by commercial and official laboratories, their accreditation status and which are the most commonly used methods.</p> <p>This review has identified that all four Public Analyst laboratories in Scotland offer testing services for meat and fish speciation. Two of these labs are fully accredited and the other two are</p> |

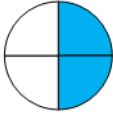
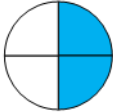
ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|---|--|---|
| | | <p>accredited method should be considered.</p> | <p>may be useful in determining whether further laboratory testing by an accredited method should be considered.</p> <p>This work is on-going. A review of current testing provision will be undertaken during 2015/16, and consideration given to the development of guidance in this area during 2016/17.</p> | <p>working towards accreditation.</p> <p>FSS will continue to engage with public analysts on this matter to ensure that testing services take account of the most up to date method development and research on interpretation of results.</p> |
| <p>35/2</p>  | <p>FSA Scotland and the New Food Body must ensure that all enforcement and surveillance testing carried out on behalf of the food authorities is carried out in laboratories which are accredited to national or international standards to allow accurate and reliable interpretation of the results.</p> | <p>The FSA and the Scottish Government agree that local authorities should use accredited laboratories where possible. In some cases there may be no or very few labs with specific accreditation for the test of interest and in such cases FSA agree that labs should use appropriate quality assurance and quality control procedures to provide assurance on the robustness of the results. These issues are being addressed in the revision of</p> | <p>FSS will ensure that official testing of food products on behalf of authorities in Scotland is undertaken by laboratories with appropriate accreditation where such laboratories can be accessed or will otherwise agree that labs should use appropriate quality assurance and quality control procedures to provide assurance on the robustness of the results.</p> <p>This work is on-going. A review of current testing</p> | <p>All four public analyst laboratories in Scotland are accredited to national standards for food testing.</p> <p>FSS has conducted a review of current testing methods used in Scotland by commercial and official laboratories, their accreditation status and which are the most commonly used methods.</p> <p>This review has identified that all four Public Analyst laboratories in Scotland offer testing services for meat and fish speciation. Two of these labs are fully accredited and the other two are working towards accreditation.</p> <p>FSS will continue to engage with public analysts on this matter to ensure that testing services take account of the most up to date method</p> |


ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|--|---|--|---|
| | | <p>EC regulation 882/2004. Where laboratory testing is appropriate, the FSA and subsequently FSS will work with industry to encourage best practice in the selection of laboratories. As noted above there may be cases where availability of labs accredited for the specific test in question may be limited in some cases. For all testing, industry should ensure that labs use appropriate quality assurance and quality control procedures to provide assurance that the results are robust and fit for their intended purpose.</p> | <p>provision will be undertaken during 2015/16, and consideration given to the development of guidance in this area during 2016/17.</p> | <p>development and research on interpretation of results.</p> |
| <p>36/2</p>  | <p>FSA Scotland and the New Food Body should encourage industry to ensure that all laboratories which they use for testing use appropriate accredited methodologies in order to interpret the results with confidence. The</p> | <p>See response to Recommendation 32.</p> | <p>See response to Recommendation 32</p> <p>FSS will support research into the development of rapid screening methods for food substitution as part of its science and evidence programme.</p> | <p>See response to recommendation 32</p> <p>Since 1 April 2014, FSS has been engaging with commercial testing laboratories and Scottish Government providers on research and development into rapid testing methods for food authenticity.</p> <p>This work will be developed as FSS's evidence</p> |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

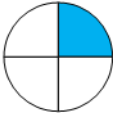
| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|--|--|---|
| | food industry should maintain the flexibility to use appropriate rapid screening testing as necessary. | | | programmes evolve during 2015/16 and beyond. |
| 37/2  | In reporting results, competent authorities in Scotland should make clear whether the % DNA figures relate to levels found in the entire product or simply the meat content of a product. | The FSA will work with local authorities and their appointed Public Analysts to ensure clear and consistent reporting of DNA analyses. | <p>FSS will ensure that the results of food authenticity and substitution testing are interpreted consistently and provide an assessment which is appropriate to the food product.</p> <p>This work is on-going. By 31 March 2016, FSS will review the need for guidance in this area.</p> | <p>Based on the findings of research, results of official control testing and surveillance sampling are interpreted as:</p> <p>>1% failure indicative of deliberate substitution 0.1-1% indicative of cross contamination <0.1% satisfactory result</p> <p>There is not yet any formal guidance on the interpretation of substitution analysis for different food products. FSS will consult with other government departments and laboratories to establish the need for guidance.</p> |
| 38/2  | FSA Scotland should work with FSA and the EU to investigate and set clear thresholds for the levels of DNA that constitutes a potential issue of authenticity taking into account consumer acceptability. | The FSA and DEFRA continue to work with industry on research to inform discussions underway at a European level to establish action levels and controls which should be adopted by both industry and regulators in the longer-term for assuring the integrity of meat products. Research has | <p>FSS will ensure it continues to be involved in developments at a UK and EU level relating to testing methodologies for food substitution and appropriate threshold values for identifying deliberate adulteration of food products.</p> <p>This work is on-going.</p> | <p>See response to recommendations 31 and 37.</p> <p>FSS participates in Defra's Food Authenticity Steering Group which is the forum for updating on developments relating to testing methodologies for food authenticity.</p> |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

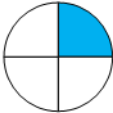
| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|---|---|---|
| | | been conducted into consumer acceptability, which is informing this work. The FSA will continue to work with DEFRA and industry on a research programme to establish good manufacturing practice in relation to avoiding carryover, which will report in December 2013, following which a discussion will be held by the FSA Board. | | |
| 39/2  | FSA Scotland and FSA should initiate further research to identify levels of crossover and methods to reduce the levels where practicable. | See responses to Recommendations 37 and 38. | See responses to Recommendations 37 and 38. | See responses to Recommendations 37 and 38. |

| 3 | Workstream 3 | Traceability and Fraud Prevention | | |
|------------|--|--|---|---|
| 1/3 | FSA Scotland should establish a dialogue with the major food companies to share information on the | The FSA will continue to develop this dialogue. In particular, the FSA has commenced a programme of work to increase | In addition to the 2013 FSA/SG response, FSS will work with industry to continue to take forward work to understand the | The FSA Data Mapping Project was completed and delivered on time by Leatherhead. The project was initiated with the joint FSA/Defra/industry workshop held on 5 September 2013 at which representatives from across industry declared their support and |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|--|--|--|
|  | <p>detail of their food supply chains to ensure that the extent and scope of the chains is well understood by all parties.</p> | <p>information sharing opportunities with industry, delivering an analysis of information and intelligence sources and potential barriers to sharing. A data mapping project, due to complete in March 2014, will provide recommendations for optimising the sharing of information and intelligence, identification and mitigation of potential barriers and the building of trust between Industry and Regulators.</p> | <p>length and complexity of supply chains.</p> <p>Forecast completion date – summer 2017</p> | <p>commitment for the principle of intelligence sharing. The project highlighted potential data sources and existing 'safe space' arrangements for sharing emerging risks data and intelligence as well as opportunities for developing further such 'safe spaces'.</p> <p>Discussions with industry sector organisations have started (for example, the Scottish Seafood Partnership will consider the FSA lead recommendation in the SSP report on traceability This relationship has led to a visit to the fish markets to understand how traceability works in this type of environment).</p> <p>Discussions have taken place with a provider of electronic tools for compliance and assurance in the food and drink industry which has been working on with its clients mass balance reconciliation</p> <p>A number of retailers, who confirmed that there is a large amount of speciation testing taking place</p> <p>Further companies/ industry organisations are to be identified and approached.</p> |
| 2/3 | <p>FSA Scotland should work with FSA to examine how best to regulate complex food chains particularly</p> | <p>The FSA believes that the regulatory framework provided by EU General Food Law is sound, with the food industry clearly</p> | <p>Start to develop guidance in 2015/16 with implementation by 2025.</p> | <p>The FSA asked industry to review its supply chains and assurance arrangements, including their testing protocols, in the light of the horsemeat incident.</p> |

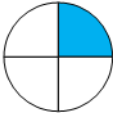

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|---|---|---|
|  | <p>against the background of the horsemeat incident.</p> | <p>responsible for the safety and correct labelling of the food it sells. The horsemeat incident demonstrates the importance of official controls relating to the traceability of product between companies, and the FSA will consider the need for changes to local authority guidance and statutory codes of practice to reinforce good practice by those who enforce food and feed law.</p> <p>Regulation EC/178/2002 defines the legal requirement for traceability with which industry must comply. FSA have asked industry to review their supply chains and assurance arrangements, including their testing protocols, in the light of this incident. FSA will continue to work with relevant trade bodies and local authorities to ensure the necessary guidance and improved assurance controls are in</p> | | <p>Industry respondents reported that they have been reviewing their supply chains and assurance arrangements and amending relevant guidance documents.</p> <p>Industry are continuing to test foodstuffs and arrangements remain in place for reporting relevant UK meat testing data to the FSA. FSA created a third party repository with Campden BRI for collating and sharing industry horsemeat results. Since February 2013, a total of 50,876 results for horsemeat/DNA in meat products have been submitted by industry to the FSA and reported. Of these, 47 tested positive for the presence of horse DNA. Appropriate action was taken, including withdrawal and appropriate notification to customers and consumers. In addition, meat authenticity is included in local authorities' annual sampling programmes.</p> <p>FSS has developed a project plan to draw together the streams of work aimed at improving traceability. Key to this is the development of traceability guidance which takes into account the particular features and requirements of each industry to ensure that the guidance can be implemented to achieve traceability in accordance with 178/2002.</p> <p>The ultimate goal of implementing traceability guidance by industry across all sectors is a long</p> |



ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--------------------------------|---------------------------------------|------------------------------------|--|--|
| | | place. | | <p>term project that may take up to 10 years to complete due to the requirements to change embedded practices.</p> <p>A specific local authority project, examining traceability of halal meat, will act as a pilot to help inform the development of this traceability project.</p> <p>FSS preliminary work to date has included engagement with:</p> <ul style="list-style-type: none"> • a number of retailers, who confirmed that there is a large amount of speciation testing taking place • a provider of electronic tools for compliance and assurance in the food and drink industry to assess current developments by industry on supply chain assurance through mass balance reconciliation • Scottish Seafood Partnership to consider the FSA lead recommendation in the SSP report on traceability • Industry (bakery manufacturer and fish markets) to understand the practical issues around traceability implementation • The Halal pilot Local authority through accompanied inspections to better understand the use of information obtained from an effective traceability audit |
| 3/3 | FSA Scotland should work with FSA and | See Recommendation 2 | See Recommendation 2 | See Recommendation 2 |

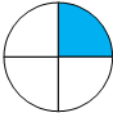

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|---|--|---|
|  | industry to review and develop measures to authenticate, validate and verify document trails. | | | |
| 5/3  | FSA Scotland should identify where gaps exist in the current traceability system and take steps to ensure that measures are implemented to prevent fraud and potential safety risks. | FSA is liaising with industry on measures that may be available to improve systems. FSA is exploring with Defra extending PAS 96 <i>Defending Food and Drink</i> . The document currently helps industry identify potential food defence threats in their food chains. The intention is to broaden the scope of the document to provide easy to use guidance to help the food industry to assess its vulnerability to other deliberate or malicious challenges, including fraud or cyber-attack. The revised document is scheduled to be published in March 2014. | Broader objectives are set out under recommendation 2 but specific progress, which marked completion against the 2013 FSA / SG response prior to FSS Vesting Day is reported here. | Publicly Available Specification (PAS96) <i>Guide to protecting and defending food and drink from deliberate attack</i> was published in October 2013. It is a revision of PAS 96 <i>Defending Food and Drink</i> , which was originally developed as a Food Defence guide. The revision was jointly sponsored by FSA and Defra. It describes a risk management methodology known as Threat Assessment Critical Control Points (TACCP) but with a scope broadened to include fraud and cybercrime, as well as the threats posed by 'insiders' or ideologically motivated individuals. FSA Scotland met with the Scottish Seafood Partnership in October 2014, which has been tasked to work with FSA to develop traceability systems. |
| 16/3 | Scottish Government should encourage the | The Scottish Government will make representation | | Regulation (EU) No 1337/2013 applied from April 2015 and requires pre-packed meat from pigs, |


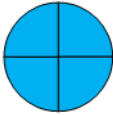
ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|--|--|--|
|  | <p>UK Government to support the extension of country of origin labelling to meat products within EU negotiations.</p> | <p>with the FSA and FSS in support of the extension of country of origin labelling to meat products.</p> | | <p>sheep, goats and poultry to be labelled with country of rearing and country of slaughter information. FSS initiated citizens' forum work to establish consumer views on Country of Origin labelling during 2014. The results of this work will be taken into account as part of FSS's work to provide greater clarity for consumers on origin labelling.</p> <p>FSS and the Scottish Government have worked with the UK Government to develop an approach to highlight Scottish interests, including meat products, during any EU level discussions on country of origin information for food labels.</p> |
| <p>20/3</p>  | <p>FSA Scotland and the New Food Body should monitor in conjunction with all stakeholders the state of the industry and the impact of any business, financial or technology changes which could impact on food safety and food standards.</p> | <p>The Scottish Government agrees that the NFB should maintain close links with, and expand if necessary, the current work of the FSA emerging risks unit. The FSA will continue to develop its work on emerging risks before Vesting Day.</p> | | <p>FSS sits on the FSA Emerging Risk Board. Priorities are currently being considered. This work will be taken on by the new Scottish food crime capability which is expected to be in place in early 2016.</p> |
| <p>50/3</p> | <p>FSA Scotland should work with industry and their auditors to identify where fraud could take place and the</p> | <p>See response to Recommendation 5.</p> | <p>See response to Recommendation 5.</p> | <p>See response to Recommendation 5.</p> |



ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|--|--|----------------------------------|
|  | measures which they could implement to prevent such fraud occurring. | | | |
| 52/3  | FSA Scotland and the New Food Body should work with the FSA to carry out research into existing traceability schemes for the processed product chain in order to determine what checks and processes could be adopted which would render the schemes less dependent on trust. | Regulation EC/178/2002 defines the legal requirement for traceability with which industry must comply. FSA have asked industry to review their supply chains and assurance arrangements, including their testing protocols, in the light of this incident. FSA will continue to work with relevant trade bodies and local authorities to ensure the necessary guidance and improved assurance controls are in place. Guidance for industry and authorities will be informed by work on Good Manufacturing Practice in relation to avoiding carry over currently being carried out by FSA and Defra through the Laboratory of the Government Chemist and due to report December | See response to Recommendation 2 | See response to Recommendation 2 |



ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|---|---|---|
| | | 2013. The Scottish Government agrees that the FSS should continue this work. | | |
| 53/3  | FSA Scotland should work with the industry to develop a risk-based approach to the level of official and industry auditing at each point of the supply chain in Scotland. | See response to Recommendation 52 | See response to Recommendation 2 | See response to Recommendation 2 |
| 4 | Workstream 4 | Regulation and Enforcement | | |
| 6/4  | FSA Scotland should review the Food Law Code of Practice (Scotland) and consider extending the scope of the food incident reporting arrangements to include non- hazardous food incidents. | The FSA has commenced a review of the Food Law Code of Practice (Scotland) with an aim of completion by March 2014 and will ensure that non-hazardous food incident management is included in a revised Code of Practice in advance of Food Standards Scotland (FSS) Vesting Day. | | Complete. Code of Practice Review completed for FSS vesting day to extend the definition of incidents to include non-hazardous incidents. Reference to product integrity related incidents included within Incident Management Plan. |
| 10/4 | The New Food Body must retain close links | The Scottish Government agrees that FSS should | | An MoU was agreed between FSS and FSA, prior to FSS's Vesting Day. |

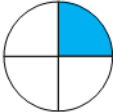

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|--|--|--|
|  | with all the authorities responsible for food safety and food standards within the UK. | retain close links with such authorities and will be supporting the development of working agreements between FSS and such bodies in preparation for Vesting Day. | | FSS continues to work closely with Defra on food standards matters and DoH on nutrition matters, and remains a member of Defra's Inter-Departmental Group on Labelling. FSS has sent a draft MoU to both DEFRA and DoH for consideration. |
| <p>11/4</p>  | The New Food Body should continue to use the existing arrangements of local delivery for the control of food standards incidents in Scotland. | The Scottish Government will ensure that arrangements for incident management will be put in place by FSS. Such arrangements will take into account that the response to food standards incidents will be coordinated at national and local level. | <p>SG and FSS aims for the continued operation of effective arrangements at local and national levels have been met.</p> <p>FSS intends to develop better links with food crime, see Recommendation 8.</p> | <p>Complete, but ongoing.</p> <p>The Food Law Code of Practice (Scotland) extends the definition of incidents to include non-hazardous incidents.</p> <p>Arrangements for effective incident handling between FSA and FSS are set out the Memorandum of Understanding between the two bodies.</p> <p>FSS published its Incident Management Plan in May 2015.</p> <p>FSS is in the process of developing a food crime unit with links between this unit and its equivalents in other governments departments.</p> <p>Local delivery arrangements are maintained by continued use of established procedures.</p> |
| 30/4 | FSA Scotland should work with the local | The FSA in Scotland will work with local authorities to | | Completed |

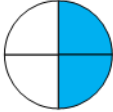

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|--|--|--|
|  | authorities in Scotland to ensure that foodstuffs are only tested for surveillance purposes when there is clear supply chain and chain of custody information to ensure results can be reliably linked to a manufacturer, processor or retailer. | ensure that appropriate information accompanies all samples taken for surveillance purposes and that the proper procedures for custody and handling of such samples are followed. The FSA expects to have completed an analysis of the issues that this presents for local authorities and the FSA by November 2013. | | The requirements for custody of surveillance samples were set out in the Food Law Code of Practice (Scotland) in 2014. |
| 44/4  | The Scottish Government should include new primary legislative powers in the New Food Body bill to enable the creation of appropriate non-criminal enforcement sanctions. Enable authorised officers to detain food which is considered safe but where there are doubts over either its composition or its description or labelling. Enable authorised officers to seize and | The Scottish Government will include such powers in the NFB Bill. | | Completed 4 th August 2015: <ul style="list-style-type: none"> • Powers provided within the Food (Scotland) Act 2015. • Communication of guidance to Local Authorities issues on 4th August. • Model notices for detention developed. |



ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|--|--|--|
| | destroy foods for non-compliance with food standards and labelling rules. | | | |
| <p>45/4</p>  | <p>The Scottish Government should include enabling powers in the New Food Body bill to allow the New Food Body to require testing and reporting of the results when appropriate. As part of this process the Scottish Government should also assess whether statutory powers are needed to require the reporting of food fraud.</p> | <p>SG will include a statutory duty to report non-compliance with food standards regulations (which will cover food fraud) and consider whether additional powers to require testing by food business operators need to be included in the FSS Bill.</p> | | <p>The power to require notification of non-compliance with food information law is contained within the Food (Scotland) Act 2015.</p> <p>Notification of food fraud; Instructions to Local Authorities being drafted with a view to completion by end of October 2015.</p> <p>Assessment of statutory reporting of test results; work to evaluate this has commenced including discussion on potential conflicts of interest and freedom of information requests. Anticipated completion by end December 2015</p> |
| <p>46/4</p>  | <p>The Scottish Government should ensure that they have the food licensing powers to require all food businesses to be licenced prior to their commencement of trade.</p> | <p>The Scottish Government considers that such powers already exist under the 1990 Food Safety Act.</p> | <p>Whilst Primary enabling powers already exist, consideration of application of any licencing scheme will take place within the development of a regulatory strategy for FSS.</p> <p>Target completion date for</p> | <p>A draft Project Initiation Document and strategy is in development.</p> |

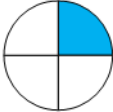

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|--|---|--|
| | | | strategy 31 st March 2016. | |
| <p>47/4</p>  | <p>The Scottish Government should ensure that the sanctions for contravention of food standards are aligned with those currently in existence for food safety. FSA Scotland and the New Food Body should work with FSA and the EU commission to ensure appropriate penalties were in place to deal with food fraud.</p> | <p>The Scottish Government will include enabling powers in the FSS Bill and will work with Ministers across the UK to ensure that the EU considerations of regulatory change are taken into account. In addition, the FSA in Scotland intends to carry out a comprehensive review of the existing penalty provisions in Scottish Food Standards legislation.</p> | <p>Enabling provisions provided within Food (Scotland) Act 2015. Application of revised penalties for food fraud is being considered within a wider review of penalties as a whole and part of the development of the FSS Regulatory Strategy.</p> <p>Target date for considering requirements is end December 2015</p> | <p>Enabling provisions were provided within Food (Scotland) Act 2015.</p> <p>The SG also introduced seizure and detention sanctions for breaches of food information law in the Food (Scotland) Act 2015 to align sanctions for food standards with the main food safety sanctions.</p> <p>Application of revised penalties for food fraud is being considered within a wider review of penalties as a whole and part of the development of the FSS Regulatory Strategy.</p> <p>A project initiation document and draft strategy are in development.</p> |
| <p>48/4</p>  | <p>The Scottish Government working with the New Food Body should discuss with the Fiscal service and the Lord Advocate's office the appointment of a specialist Procurator Fiscal with expertise in food law in order to give food standards</p> | <p>The Scottish Government will consider this proposal later this year with the Crown Office and Procurator Service.</p> | <p>Progress will be reported by SG</p> | <p>Any progress towards the original recommendation would be for SG to report. However, FSS will consider assessment of the processes for reporting cases for prosecution as part of the development of Scottish food crime capability and will discuss these with the Crown Office and Procurator Fiscal Service, with a view to ensuring that Procurators Fiscal are sufficiently supported with factual and expert evidence and that cases of merit are prosecuted.</p> |


ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|--|--|--|
| | and food safety cases a higher priority than at present. | | | |
| 49/4  | The New Food Body should continue with the provision of training for food enforcement staff as currently provided by FSA Scotland. | The Scottish Government agrees and FSS will continue the work of the FSA in provision of such training. | | Complete 1 st April 2015. An annual Local Authority training provision is in place with no intended change to its provision. Completed 1 st April 2015 |
| 51/4  | FSA Scotland should ensure that unannounced visits to cutting plants and other food businesses take place with frequency based on risk and known compliance with the regulations. | The FSA has introduced a system of unannounced visits to cutting plants. Local authority inspections are generally carried out without prior warning, except in particular circumstances where prior notification of the food business operator is necessary. This expectation is currently set out in FSA Practice guidance for local authorities but will be incorporated in the next revision of the Food Law Code of Practice (Scotland) which the FSA aims to complete by March 2014. | | Complete 1 st April 2015. The Code of Practice review is complete and maintains the instruction for unannounced inspections as the norm. |

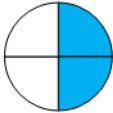


ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|---|--|---|
| 54/4  | <p>The New Food Body should set up a Scottish Framework Agreement with the Local Authorities in which there should be an obligation for Local Authorities to make sure they met the agreed standard determined by the New Food Body.</p> | <p>The Scottish Government agrees with the recommendation and during the transition to FSS a revised Framework Agreement with local authorities will be developed jointly with the FSA.</p> | <p>Expected completion date 31st March 2016</p> | <p>Review of the framework agreement is at its initial stages with the Policy team in FSS. Preliminary discussions with Scottish Local Authorities via SFELC suggests that there is support for strengthening the Framework, however this work is linked with a wider review of the Food Law Code of Practice and development of FSS Regulatory Strategy the development of both of these is at the first stages of planning.</p> |
| 55/4  | <p>The Scottish Government should ensure that a committee with the same terms of reference as SFELC should be enshrined in the bill to establish the New Food Body thereby enabling the New Food Body to continue to have access to an advisory committee such as SFELC.</p> | <p>The Scottish Government recognises the value of the work done by SFELC, and the opportunities it affords for the New Food Body to link in with a range of representatives of central and local government, consumers and industry. The Scottish Government agrees that FSS should continue to have access to SFELC, but considers that to enshrine a committee such as SFELC in the legislation to establish FSS would unduly compromise</p> | | <p>Completed 1st April 2015.</p> <p>Scottish Food Enforcement Liaison Committee continues to operate with support from FSS. The SFELC Sub Committees on food safety, food standards and feed also continue to operate.</p> |

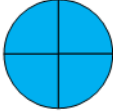
ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|--|--|--|--|
| | | SFELC' s independence and flexibility | | |
| 56/4  | The Scottish Government should explore the possibility of arrangements for recovering expenses for additional Official Controls as soon as possible under the provisions of Article 28 of Regulation (EC) No 882/2004. | The Scottish Government agrees with the recommendation and considers that this is a matter for the FSA to consider. Regulation (EC) No 882/2004, including the charging provisions, is in the process of being revised. The FSA is liaising with Scottish Government on joint UK negotiating lines. These are being developed in light of the adulteration of products with horse meat. The FSA in Scotland will review the risk rating and intervention frequencies as part of the exercise to revise the Code of Practice, which the FSA aims to complete by March 2014. | <p>Consideration of the application of charges for additional official controls will be carried out in the context of the development of FSS Regulatory Strategy in line with the current on-going review of Article 28 of 882/2004 being carried out by the Commission.</p> <p>Forecast completion date is in line with EU time frames which are currently overdue.</p> | <p>A regulatory strategy project initiation document has been developed.</p> <p>There is an on-going review of Regulation 882/2004, including potential revisions to Article 28. Agreement has not yet been reached on acceptable draft text for the refit instrument as a whole to allow this to be submitted to the Council and Parliament for formal agreement.</p> |
| 57/4 | FSA Scotland should review the Food Law Code of Practice (Scotland) to determine | The FSA in Scotland will review the risk rating and intervention frequencies as part of the exercise to | The original objective has been met, however FSS continues to review the Code in relation to risk | Additional flexibilities for local authorities were provided in the Code of Practice published in June 2014. These permitted arrangements to allow local authorities to reduce inspections at establishments |


ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|---|---|---|
|  | <p>if the current risk rating and intervention frequencies are appropriate and represent the best use of enforcement resources in Scotland.</p> | <p>revise the Code of Practice, which the FSA aims to complete by March 2014.</p> | <p>rating and intervention frequency. Anticipated completion date 31st March 2017.</p> | <p>with a record of sustained compliance. A working group has been established to further review the Code of Practice, including consideration of combining food safety and food standards inspections. A 'test of change' pilot of at least six-months is planned to commence by 31st January 2016.</p> |
| <p>58/4</p>  | <p>It will be important for COSLA and FSA Scotland in the short term and the New Food Body in the longer term to work closely to develop a workforce plan for delivering Scotland's food safety and standards regime that ensured the efficient use of resources.</p> | <p>The FSA in Scotland and COSLA have agreed to develop a workforce plan for delivering local authorities responsibilities for food safety and standards.</p> | | <p>This recommendation is led by COSLA and is part of a wider review of trading standards services across Scotland.</p> <p>FSS is currently seeking an update from COSLA.</p> |
| <p>59/4</p>  | <p>FSA Scotland and the New Food Body should work with SFELC to identify the best service delivery model for Scotland to make the best use of resources in relation to the harmonised use of staff</p> | <p>The Scottish Government consultation on the scope and responsibilities for FSS considered options for a potential transfer of functions to FSS. If such transfers take place the Scottish Government will examine service delivery</p> | <p>There were no changes to delivery arrangements at vesting day, but FSS continues to review.</p> <p>Feed review Board update in September 2015.</p> <p>LA/FSS Approvals working</p> | <p>Ongoing review of feed controls delivery with a view to delivering a model that ensures compliance and best use of resource and expertise across LA and FSS resource.</p> <p>A paper will be presented to the Board on potential models September 2015.</p> <p>On-going Approvals working Group looking at best means of delivering official controls in non FSS</p> |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|---|---|--|
| | from environmental health, trading standards and FSA Scotland Operations. | models for these functions. Prior to Vesting Day the FSA in Scotland will work with SFELC and relevant organisations represented on the committee to help support the best use of resources available to local authorities and the FSA for the delivery of Official Controls in Scotland. | Group will deliver findings December 2016. | approved establishments. |
| 60/4  | FSA Scotland and SFELC should work to develop a training strategy for enforcement officers both in FSA Scotland and in Local Authorities. | The FSA and SFELC will develop a training strategy to support annual training plans. | | Completed. SFELC completed guidance to Local Authorities in relation to training in November 2014. This document provided recommendations for the training and retention of graduate staff from environmental health and technical backgrounds to support a fully functioning resource across all the disciplines of the Local Authority Environmental health service and which met the requirements of competence under the Food Law Code of Practice. |
| 5 | Workstream 5 | Public Procurement | | |
| 13/5 | FSA Scotland should work with Scotland | The FSA in Scotland will work with Scottish | In addition to the FSA/SG response FSS will work with | Completed. |

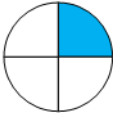

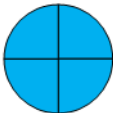
ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|---|---|---|
|  | Excel to develop a standard operating procedure and guidance for all authorities with responsibility for procurement and their contract management in Scotland. | Government, the public sector Centre of Procurement Expertise and local authorities to deliver guidance and will take account of wider work in the FSA and Scottish Government on public sector procurement. This guidance will be produced for consultation with the wider public sector by the end of March 2014. | Scotland's Centres of Procurement Expertise ¹ (CoPEs) to: <ul style="list-style-type: none"> • Develop a central register of public sector suppliers that shall be updated annually • Develop a database to enable (CoPEs) and local authority Environmental Health colleagues to share inspection and sampling information, this forms the second phase of this project. It is anticipated that the system shall be ready for use in 2017/18. | <ul style="list-style-type: none"> • A Public Sector Incident Protocol was drafted during 2014 and tested in a simulated exercise with public procurement bodies in February 2015. The Protocol was refined, agreed with the CoPEs and published in July 2015. • A central register of public sector suppliers has been collated and shall be updated at least annually. • Standardised contract requirements were agreed for traceability, authenticity and sampling which are to be used by the CoPEs. FSS developed information sharing agreements that will also be used for the sharing of inspection and sampling results, which forms the second phase of this project. |



| 6 | Workstream 6 | IT Systems | | |
|------|--|---|---|---|
| 25/6 | The New Food Body should ensure that integrated IT systems | The Scottish Government agrees that further integration of key IT | A scoping exercise is currently being undertaken to assess the full integration | The FSA's 'Pentagon' project was the first to look at how we could put these systems on to one platform. Its current Information Strategy |

¹ Scotland Excel, NHS National Services Scotland, Scottish Prison Service, Advanced Procurement for Universities and Colleges and Cordia (Arm's length purchasing body for Glasgow City Council)


ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|--|--|--|
|  | <p>are in place for recording data relating to official controls and other interventions at food businesses. These systems should be mandated for use by all competent authorities in Scotland.</p> | <p>systems would be beneficial. Opportunities for such integration will be explored during transition to FSS and after Vesting Day.</p> | <p>of the existing IT systems into a single integrated national platform.</p> <p>Options are expected to be evaluated and an identified preference selected by the 1 April 2016.</p> | <p>Implementation Programme (ISIP) is building on the outputs of Pentagon to explore advanced, easier and more effective ways for local authorities to provide data to the FSA. Pilot work on this is scheduled during 2015-16.</p> <p>FSS will track developments of ISIP to assess options for Scotland but will consider options for Scotland in parallel. In this regard a full options appraisal and discussion paper is in the process of being drafted to determine the feasibility of a single integrated national platform.</p> |
| <p>26/6</p>  | <p>FSA Scotland should assess whether it was feasible and economic to develop a common database language to enable more effective interrogation and provision of results from the 4 main IT systems.</p> | <p>The FSA will assess the feasibility of integrating the 4 main IT systems with the aim of providing improved data interrogation and reporting. The feasibility study will be completed by the end of January 2014.</p> | <p>The development of a single integrated national platform will include an assessment of a common database language and data standard.</p> | <p>A full options appraisal and discussion paper is in the process of being drafted to determine the feasibility of a single integrated national platform.</p> <p>FSS have also met with FSA ISIP Programme Team and have reached agreement to work jointly where there is opportunity to do so. A pilot exercise with LAs in England is underway and FSS will monitor progress closely with ISIP Programme management to identify areas where improvements and efficiencies can translate into Scottish network.</p> |
| <p>28/6</p>  | <p>The New Food Body should develop an efficient rapid alert system for Scotland which may include a new or modified IT</p> | <p>The Scottish Government agrees that FSS should have an efficient rapid alert system in place for the reporting of incidents. The existing system for incident</p> | | <p>Completed.</p> <p>FSS has agreed suitable arrangements for access to EU rapid alert channels</p> |

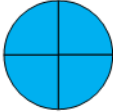

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|--|--|---|
| | system and the use of a specific proforma to report incidents. | monitoring UK wide will continue beyond vesting day. | | |
| 7 | Workstream 7 | Contingency Planning | | |
| 7/7  | FSA Scotland should work with the Food Fraud Advisory Unit to assess whether communications and feedback from the unit to the local authorities and industry in Scotland could be improved and developed further. | The FSA is reviewing the operation of the Food Fraud Unit to maximise intelligence sharing opportunities with local authorities and industry, with enhanced arrangements delivered by December 2013. The FSA has also commenced a programme of work to increase information sharing opportunities with industry, delivering the initial project by March 2014, as referenced in 1 above. | FSS will develop and operate an effective and integrated intelligence collection and analysis facility, including information collected by industry through its sampling and monitoring activities and intelligence collected by police and other law enforcement bodies across Scotland and the UK. | FSS has directly employed specialist expertise temporarily from May 2015 to work with the police and other agencies of local and national government to advise on the nature of a food crime unit for FSS. In June 2015, FSS utilised the expertise of the FSA's Food Crime Unit to develop proposals for food crime capability in FSS. Discussions covered areas for improvement and further development of communications with LAs and industry, and this area of work will be progressed once a food crime capability has been established in FSS. The blueprint for an FSS Food Crime Intelligence Unit will be presented to the FSS Board in September 2015. |
| 22/7  | The New Food Body must develop an integrated intelligence gathering strategy involving all stakeholders with the inclusion of a | The Scottish Government agrees that the NFB should have such a strategy. The FSA will commence development in advance of Vesting Day and the NFB will continue thereafter. | The objective in Recommendation 8 covers Recommendation 22: FSS will manage an effective and integrated intelligence collection and | FSA created a third party repository with Campden BRI for collating and sharing industry horse meat test results. Since February 2013, a total of 50,876 results for horse meat/DNA in meat products have been submitted by industry to the FSA and reported. Of these, 47 tested positive for the presence of horse DNA. Appropriate action was |

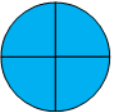

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|--|--|--|
| | whistleblowing facility and procedures to ensure that individuals or organisations are not deterred from reporting problems. | | analysis facility in Scotland which works collaboratively with UK wide systems. | <p>taken, including withdrawal and appropriate notification to customers and consumers. In addition, meat authenticity is included in local authorities' annual sampling programmes.</p> <p>In addition, the FSA commissioned a Data Mapping Project with Leatherhead Food Research. The project was completed and delivered on time by Leatherhead in 2014, and promulgated widely with industry stakeholders. The project highlighted potential data sources and existing 'safe space' arrangements for sharing emerging risks data and intelligence as well as opportunities for developing further such 'safe spaces'.</p> <p>A safe-space facility was agreed as part of the standing items for the Scottish Food Enforcement Liaison Committee's agenda.</p> |
| <p>27/7</p>  | The New Food Body should establish a risk register which should be proactive in identifying potential issues related to food standards and food safety in Scotland and would be the responsibility of the Board of the New Food Body. The New Food | The Scottish Government agrees that FSS should have such a register as part of its corporate governance processes. | <p>FSS will identify strategic risks and put in place processes that enable escalation of risks to ensure they are managed at the right level.</p> <p>Where risks threaten delivery of strategic outcomes then there is opportunity for those risks to be discussed at FSS Board</p> | <p>Completed; risk register in place.</p> <p>Appropriate strategic risks have been identified. Risk processes are in place that enable escalation of risks to ensure they are managed at the right level. Where risks threaten delivery of strategic outcomes then there is opportunity for those risks to be discussed at FSS Board level.</p> <p>FSS has established an Audit And Risk Committee.</p> <p>FSS is not currently aware of relevant UK risk</p> |



ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|---|--|--|
| | Body should participate fully in wider UK committees looking at risk. | | level. | committees but will keep this under review. Scottish Government Resilience Team has committed to include FSS in their quarterly risk report to inform us of emerging risks. |
| 61/7  | FSA Scotland and the New Food Body should develop and maintain contingency plans for dealing with a major food safety or food standards incident in Scotland or elsewhere in the UK. | The FSA will work with stakeholders to maintain appropriate contingency plans. Scottish Government will ensure that arrangements for the management of such incidents are clearly articulated in all appropriate working agreements between FSS and key stakeholders in advance of Vesting Day. | | Completed. Continued arrangements for effective incident handling between FSA and FSS are set out the MoU between the two bodies. FSS published its Incident Management Plan in May 2015 with input from the SG resilience team. Scottish Government's <i>Preparing Scotland</i> guidance on Preparing for Emergencies was considered in the development of the FSS plan. Food Standards Scotland Chief Executive and staff met with a member of the Scottish Government Resilience Team on 18 th August to assist FSS's understanding of their role in the event that Scottish Government Resilience Room (SGoRR) is activated to respond to a major food incident in Scotland. |
| 62/7  | The New Food Body should work closely with the FSA to ensure that there was integration between the Scottish major incident | The Scottish Government agrees and will work to ensure that the FSS contingency plan is integrated with the Scottish incident plan and is | | Completed. Arrangements for effective incident handling between FSA and FSS are set out the MoU between the two bodies. |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES



| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|--|---|--|--|
| | plan and the equivalent FSA contingency plan. | compatible with the FSA incident plan. The FSA agrees on the importance of an integrated approach to incident management and will work with FSS to ensure alignment of contingency plans before and after Vesting Day. | | FSS published its Incident Management Plan in May 2015. The arrangements in this document are compatible with those of the FSA. |
| 63/7  | The New Food Body should ensure that a fighting fund is available to respond to major incidents or significant investigations where specialist expertise is required. | The Scottish Government agrees that such funding should be included in the budget settlement for FSS. | | Completed. FSS has agreed <i>fighting fund</i> budget of £150k and communicated arrangements to LAs |
| 8 | Workstream 8 Communications | | | |
| 4/8  | FSA Scotland and Scottish Government Ministers should make public statements that the authenticity of foods is important and food fraud will be treated as a criminal offence. | The FSA and Scottish Government agree that both Ministers and the FSA should make public statements regarding authenticity of food and reinforce that food fraud is a criminal offence. The Cabinet Secretary for Rural | | Completed. Statements to this effect were included in the Ministerial foreword to the 2014 revision of the Food Law Code of Practice (Scotland). Equivalent statements were repeated in the Food Standards Scotland foreword to the 2015 revision of this Code of Practice, which was approved by Ministers in accordance with statutory requirements |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES



| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|---|--|---|
| | | Affairs has recently written to organisations supporting businesses in the supply and processing of fishery products highlighting the importance of accurate labelling and stressing that any errors must be dealt with robustly. | | |
| 9/8  | The New Food Body should develop close links with the FSAI to exchange information and work together on projects of joint interest. | The Scottish Government agrees that FSS should develop working relationships with the FSAI after Vesting Day. | FSS will develop a coherent strategy for effective EU and international engagement. FSS should be in a position to update the Board on the nature and scope of FSS's EU and international engagement strategy by December 2016. | Work towards an engagement programme has not formally commenced but will develop informally as opportunities arise during the first 18 months of FSS's existence. |
| 14/8  | FSA Scotland should establish relationships with the EU Commission to ensure that Scotland is involved in any discussions on food standards. In the first | Under the terms of the Concordat on Co-ordination of EU Policy, Scottish Ministers and officials expect to be fully involved in discussions about the formulation of the UK's policy position on all issues | FSS will develop protocols for engagement with the EU Commission within the terms of the Concordat on Co-ordination of European Union Policy Issues ² Work towards meeting this | Arrangements for engagement with the Commission were set out in the MoU between FSS and FSA, which was agreed before FSS Vesting Day. This MoU recognises the Concordat on Coordination of EU Policy. |

² <http://www.scotland.gov.uk/Resource/0043/00436627.pdf>


ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|---|--|--|
| | instance this should be through the FSA but in the longer term the New Food Body should build relationships with the Commission. | falling within devolved responsibility. The Scottish Government agrees that FSS should develop relationships with the Commission post Vesting Day. | recommendation will be taken forward as part of the EU and international engagement strategy referred to under recommendation 9. | |
| 15/8  | The New Food Body should also be linked into international networks such as the International Food Safety Authorities Network (INFOSAN), the World Health Organisation (WHO) and the Food and Agriculture Organisation (FAO). | The Scottish Government agrees that FSS should develop such international relationships and linkages as required to discharge its functions. | See Recommendation 9 | See Recommendation 9 |
| 21/8  | The New Food Body must work in partnership with FSA and DEFRA to ensure it has access to expertise which would not otherwise be available in the organisation. | The Scottish Government agrees that partnership working with the FSA and DEFRA will be important for FSS and expects working arrangements between such bodies to be formalised through appropriate agreements before Vesting Day. | FSS and Defra will continue joint working in all relevant areas where FSA and Defra previously liaised and will have an agreed Memorandum of Understanding | FSS continues to work closely with Defra on food standards matters that FSAS was previously involved in and remains a member of Defra's Inter-Departmental Group on Labelling. FSS has sent a draft MoU to DEFRA for consideration. |

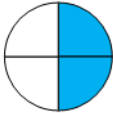


ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|---|--|--|---|
| <p>29/8</p>  | <p>The New Food Body should liaise with FSA to decide whether it would either report alerts directly to the EU or whether they should be passed through the FSA as the current national contact point for the UK.</p> | <p>The FSA agrees that close collaboration between the FSA and the FSS will be critical in terms of serving the interests of Scottish and UK consumers in Europe. Scottish Ministers consider that an early priority in the programme of work to establish FSS should be development of an understanding on how the FSA and FSS will produce integrated protocols that will ensure that FSS has full access to EU rapid alerts and appropriate facilities to route alerts to the EU.</p> | | <p>Completed.</p> <p>FSS has agreed suitable arrangements for access to EU rapid alert channels</p> |
| <p>64/8</p>  | <p>FSA Scotland should carry out a full review of the communications network to identify where improvements could be made in terms of internal and external communications during food incidents.</p> | <p>The FSA is conducting a review of communications during incidents as part of the major incidents plan review recommended by the Troop Review. This is due to be completed by April 2014. The FSA will review the communications channels used in consumer</p> | | <p>Review completed.</p> <p>Review of Incident Handling Communications Plans completed April 2015. Communications strategy for FSS agreed with the Senior Management Team and is being implemented in FY15-16. Social media and digital channels being developed and prioritised.</p> |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|---|--|---|---|
| | | messaging as part of the review of communications in an incident and implement any necessary improvements identified where possible. This is scheduled for April 2014. The Scottish Government agrees that FSS should continue the work of the FSA on consumer communications and develop a communications strategy. | | |
| 65/8  | FSA Scotland and the New Food Body should be proactive and timely in its communications with consumers including making use of social networks and 'smart' communication device technologies. | See response to recommendation 64. | <p>A culture of transparency and timeliness in all communications will be cultivated across the organisation.</p> <p>Social network channels (primarily twitter and Facebook) will be developed.</p> <p>Digital marketing will lie at the heart of campaign work.</p> | <p>Social network channels (primarily twitter and Facebook) being developed.</p> <p>Development of a consumer attitudes and behaviour tracking survey in relation to food safety and diet for Scotland is underway. The first wave is due for completion November 2015.</p> <p>A segmentation study has been commissioned and work will commence shortly. For delivery Dec 2015. Research agency for topic-specific insight gathering, ongoing Citizens' Forums and Teachers' Panels has been procured.</p> |
| 66/8 | The New Food Body should engage | The Scottish Government agrees that FSS should | See response to recommendation 65 | Work across consumer research and engagement for FSS has commenced |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|--|--|--|---|--|
|  | effectively with consumers and consumer organisations including conducting its own consumer research and engagement exercises. | continue and develop the consumer engagement work of the FSA. | <p>In addition: A programme of stakeholder engagement through regular open forums attended by members of the Senior Management Team and Board will be implemented.</p> <p>A bulletin/newsletter from the CEO to key stakeholders is also in development</p> | |
| 67/8  | The Scottish Government should ensure that the Board of the New Food Body has consumer representation. | The Scottish Government will consider how consumers may be best represented in establishing the governance arrangements for FSS. | | <p>Completed prior to Vesting Day.</p> <p>The FSS Board will be responsible for future appointments.</p> |
| 69/8  | The New Food Body should explore the availability of existing consumer engagement networks operated by the Scottish Government and other partner agencies with which the New Food Body will be working | The Scottish Government agrees that working closely with organisations with existing consumer engagement networks should be integrated into FSS communications strategy. | | <p>Partnering with public, private and third sector organisations is a cornerstone of FSS's Communications Strategy and the work of developing those partnerships is underway.</p> <p>Partnerships are actively being developed with newly procured fully managed service agency to support and extend reach of FSS messaging and campaigns.</p> |

ANNEX A: PROGRESS TOWARDS COMPLETION OF OBJECTIVES

| Rec/WS Progress category | Recommendation | FSA / SG Response November 2013 | Updated Objective(s) and forecast completion date(s) | Progress towards completion |
|---|--|---|---|--|
| | with the intention of joining as a partner with appropriate networks. | | | A stakeholder engagement programme is being agreed and will be implemented FY15-16 |
| | Not Allocated | | | |
| 68 | The Scottish Government should assess the resource needs of Citizens' Advice Scotland in order to ensure that the organisation can effectively represent consumer interests in relation to food safety and food standard issues. | This recommendation is out with the scope of work to improve food safety and standards controls | Not applicable | Not applicable |