

## FSS Reprioritisation Exercise

### 1 Purpose of the paper

1.1 This paper brings proposals to the Board on FSS' priorities for 2023/24 financial year and beyond. FSS has faced considerable pressures stemming from Brexit and the spending review is a significant challenge to our financial situation. This paper recommends FSS activities to be stopped, paused, continued with an exit strategy or scaled appropriately. The Board is asked to:

- **Note** the predicted financial challenges we face noted in **Section 4**.
- **Consider** the proposed priorities and comment on any specific proposals, noting the ambiguity on the Scottish Veterinary Service (SVS) and Retained European Union Law (REUL).
- **Agree** the proposed priorities for 2023/24 (**Annex B to F**).

### 2 Strategic aims

2.1 This work supports all of the FSS Strategic outcomes.

### 3 Background

3.1 In terms of budgetary management for this financial year, and given the fact that we had no notice regarding the Scottish Government's (SG) Resource Spending Review (RSR) delivered in May 2022, the executive has been required to take a tactical approach to managing the budget this year. We have used the second half of the year to re-set and re-plan. This is not an approach that is sustainable for future years.

3.2 In effect, the RSR has resulted in a real-terms cut of around 12.5% through to 2026/7 and it has required us to make the difficult decision to freeze recruitment this year leading to senior executive concern about the health and well-being of the organisation and our staff going forward. Put simply, we are unable to continue to deliver what was proposed in our 2021-26 strategy.

3.3 Our current FTE is 302 and our working assumption is that it is unaffordable to increase headcount. So we now need to look at the work we do, re-prioritise, re-focus and consider how we work more smartly. Currently we have a massive increase in organisational workload driving general fatigue and weariness, are losing good staff and risk losing good will. If this situation continues, we risk service failure.

3.4 We must set out a new approach going forward. This means identifying and defining any opportunities, accepting the difference in our situation positively and showing our leadership commitment to the future of the organisation and our employees, though it's a future that will be different.

- 3.5 This means a future organisation that will be leaner, but will work smarter; focused on fewer, clearer deliverables; and, an organisation confident to say “no” to new work when that should be the answer.
- 3.6 We will of course continue to protect public health, but in a smarter, more efficient and effective way. This also requires us to be supported by staff with the right skills and capability and most importantly are led well by the Board and the FSS’ leadership group.
- 3.7 The proposals in this paper aim to strike a balance between reducing what we do while investing in critical areas such as data, digital and staff capability.

## 4 FSS Financial Position

- 4.1 The impact of EU exit has been heavy for FSS bringing significant financial and staffing pressures on operational delivery. The May 2022 RSR announcement further impacted on FSS’ financial situation. **Figure 1**, an extract from the FSS Financial Plan 2022-26, details the imminent financial challenges facing the organisation.
- 4.2 It is worthy of note that the £1 million over-commitment of budget in financial year 2023/24 is based on current staffing numbers (302) and does not include the current vacancies being carried (60 posts) or the additional posts as documented in the FSS Workforce Plan (a further 56 posts) to meet continued EU Exit consequential requirements. Our assessment is that moving into financial year 2023/24 FSS will be 116 full time equivalent (FTE) posts short of what is required to deliver current organisational business.
- 4.3 Based on present day headcount, the financial plan shows that the budget gap will grow to £2 million+ in future years if prioritisation work is not progressed.

	2021/22	2022/23	2023/24	%	2024/25	%	2025/26	%
Staff	15,436,000	17,159,235	17,863,976	74%	18,644,450	76%	19,119,812	77%
Administration	4,508,000	4,600,992	4,847,000	20%	4,905,000	20%	5,000,000	20%
Programme	5,584,247	5,683,029	5,600,306	24%	5,336,306	22%	5,017,306	20%
Capital	244,000	394,889	460,000	2%	440,000	2%	440,000	2%
Income	(4,979,781)	(4,809,177)	(4,800,000)	-20%	(4,800,000)	-20%	(4,800,000)	-19%
Total Spend/ Budget estimate	<b>20,792,466</b>	<b>23,028,968</b>	<b>23,971,282</b>		<b>24,525,756</b>		<b>24,777,118</b>	
SG budget allocation		22,900,000	22,900,000		22,600,000		22,600,000	
Over commitment of budget		(128,968)	(1,071,282)		(1,925,756)		(2,177,118)	

Figure 1: Key figures for FSS budget to 2025/26

- 4.4 **Figure 2** details the number of vacancies currently within FSS. This does not include the 56 additional posts required as per the FSS Workforce Plan 2022-25.

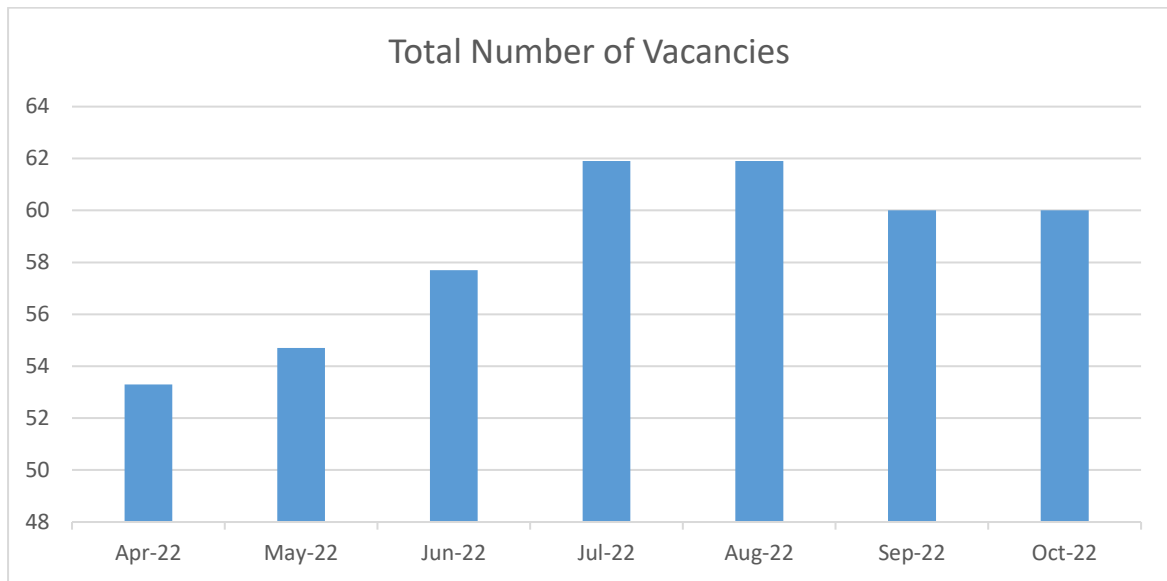


Figure 2: Number of vacancies in FSS

## 5 Discussion

- 5.1 As the Board will be aware, prioritisation was assessed against a set of FSS organisation descriptors, principles and associated weightings [**Annex A**]. The resulting scores alone did not determine priorities and a number of other factors were taken into consideration. These include interdependencies with other functions, contractual requirements, whether the function is an organisational enabler, produces an efficiency or seeks to address a FSS strategic risk.
- 5.2 It should be noted that the prioritised functions below do not represent all activities that FSS undertakes. Essential underpinning core activities, such as finance, human resources, science and evidence generally and other routine functions, were not prioritised at this time. FSS is working with other SG delivery bodies on potential rationalisation of support services and considering other options too around support services.
- 5.3 The proposed priority areas are:
- The Regulatory Strategy & Scottish Authorities Food Enforcement Rebuild (SAFER) programme
  - Food crime and incidents
  - Data and digital transformation
  - Official Controls (OC) for food and feed
  - Scottish Veterinary Service (SVS)
  - Retained European Union law
  - Diet and nutrition

### **5.3.1 Regulatory Strategy & Scottish Authorities Food Enforcement Rebuild (SAFER) programme**

The purpose of this is to help manage the biggest risk on our strategic risk register. The [October Board paper](#) set out the principles of the proposed SAFER programme and were agreed by the Board. This programme will also integrate with the existing Regulatory Strategy programme as the key outputs from that programme are relevant to SAFER.

### **5.3.2 Food crime and incidents**

Effective incident management is key to protecting public health and where there are non-routine incidents, in general terms a large proportion of the organisation pivots to incident management. Incident management is therefore about our capability for critical response to crisis situations alongside the day to day activity around products recalls etc. Food crime includes investigation related to public health protection and also includes intelligence capability which is important in informing our approach to surveillance and sampling.

### **5.3.3 Data and digital transformation**

The Board heard a [presentation](#) at the October 2022 meeting. If there ever was doubt about the advantages of digital they have been dispelled over the last 18 months with our recruitment of dedicated data scientists. Digital transformation is key to our ability to work smarter but also requires us to upskill staff across the organisation so we can make the best of digital capability. A data led, digitally driven organisation means we can use information to develop intelligence and insight to inform what we do.

### **5.3.4 Official Controls (OC) for food and feed**

These are statutory requirements FSS must deliver. Our legal requirement is quite constrained in its flexibility. Without veterinary and meat inspector oversight food businesses are unable to operate. Part of the challenge here will be how we can use spare capacity in the meat sector to support feed delivery. Again this would mean developing the capability of staff and provide more organisational resilience and job enrichment.

### **5.3.5 Scottish Veterinary Service (SVS)**

The Board will be aware of the SNP's manifesto commitment to set up a central SVS. A programme has been set up by SG and FSS is represented at steering group and programme board level. The current assumption is that ministers will be asked to make a decision in March 2023 on the right model for an SVS. A status quo decision will have little impact on FSS whereas a decision to move FSS functions to another organisation would have an impact.

### 5.3.6 Retained European Union law

Again, this is an issue the Board are well aware of. The December 2022 FSS Board paper sets out more detail on this subject. While there is some ambiguity on what changes (if any) the UK Parliament might make to the “Retained EU law (reform and revocation) Bill” through its passage in Parliament, it is clear it will have a significant impact on FSS given around 95% of our food law responsibilities is EU derived. The impact of the final UK Government Bill and subsequent decisions could be significant in terms of FSS resourcing. Even if the Bill’s current proposals to sunset some laws in 2023 are amended to 2026, it will still impact FSS and Scotland significantly. If the Bill is dropped – which is seen as unlikely – then clearly that would remove the need to allocate FSS resource to it. Reviewing over 200 Scottish statutory instruments (SSIs) either in one year or over three years will consume significant policy expertise and resources. This is not work the executive had planned for and contributes nothing to the delivery of the Board Strategy. But given the consequences for Scottish consumers, it is not something we can ignore.

### 5.3.7 Diet and nutrition

The intention is to present a new FSS public health nutrition strategy to the Board at the March meeting. The intention is to focus our efforts on monitoring and highlight where progress is needed or isn’t being made. Intake 24 and the capability this offers will be key going forward. The proposed approach will be to rebalance our focus more evenly on influencing the industry and the food environment as well as our work to influence consumers.

- 5.4 Alongside identifying priorities and what we “must do”, we have also identified what we recommend we stop or pause. A key element underpinning our decision making is to ensure that we invest in digital though investment in digital leaves less resource for other priorities. However, without improved digital capacity and capability, our ability to improve our efficiency is constrained. More detail is in **Annexes B to F**.

## 6 Identification of risks and issues

- 6.1 The identification and agreement of a prioritised programme of activities will enable FSS to focus on and deliver its priority business through realignment of resources.

## 7 Equality Impact Assessment and Fairer Scotland Duty

- 7.1 Completion of an Equality Impact Assessment and Fairer Scotland Duty Assessment are not required for this paper.

## 8 Stakeholder Communications

- 8.1 FSS has not undertaken an external consultation exercise on the proposals here as the issue doesn't change our statutory obligations. What we have done prioritises our focal areas and nothing proposed be stopped poses a direct risk to public health. In some circumstance the requirement can be met elsewhere. However, given our Framework Agreement with SG Ministers, the chair and CEO have agreed that SG ministers be provided with the opportunity to share any observations to inform the Board's consideration. Decisions on FSS policy and strategy are for the Board and the engagement has been done on that basis.
- 8.2 Ministers have recognised the important role FSS plays as a key partner in protecting public health. While Ministers have acknowledged the need for this prioritisation exercise, they have expressed concern that these current recommendations risk government's ability to take forward evidence-based action to improve diet and healthy weight.
- 8.3 The FSS Executive will continue to engage with SG officials and in terms of the public health bill, the majority of the work to support the Bill will be completed this financial year. Work will also be required to support the progression of the Bill stages through parliament (for example providing evidence to committees) which we will support. The commitment for this work is likely to be sporadic and it is not expected to have a large impact on FSS staff time beyond April 2023. As for the wider aspects of our nutrition work, we will be exploring ways in which we can work smarter to support a shift in our approach with a revised nutrition strategy. Key to this are the ways in which we can collaborate across Government in how we collate, gather and share dietary data and how we can work more smartly in procurement of external data.

## 9 Next Steps

- 9.1 This paper sets out the strategic priorities for FSS going forward. However, given our financial settlement, the Executive must continue to make prioritisation decisions in areas such as business as usual to ensure that we are able to focus on the priorities but also ensure we don't spread ourselves too thinly. We will therefore ensure ongoing discussion at our internal Directorate Governance Group and the Executive Leadership Team to ensure we balance our resources across our priorities and other activities and ensure our business plan aligns with our refreshed priorities.
- 9.2 Our intention is to be ready to implement these changes for the next financial year including any reconfiguration of the current structure to support our priorities.

## 10 Conclusion/Recommendations

10.1 Once the reprioritised programme of activities has been confirmed, FSS functions that did not go through the prioritisation process will be considered to see how they are impacted by the prioritisation results. Resource implications will also be considered, along with the resulting financial impacts.

10.2 The Board is asked to:

- **Note** the financial challenges we face noted in **Section 4**.
- **Consider** the proposed priorities and comment on any specific proposals, noting the ambiguity on the Scottish Veterinary Service (SVS) and Retained European Union Law (REUL).
- **Agree** the proposed priorities for 2023/24 (**Annex B to F**).

Please direct queries to:

Author: Geoff Ogle

Contact details: [Geoff.Ogle@fss.scot](mailto:Geoff.Ogle@fss.scot)

Date 15/11/22

**Annex A**

**Organisational Descriptors and weightings** (of which a maximum of 3 could be chosen when mapping functions against these)

	<b>Organisational descriptor</b>	<b>Weight</b>
<b>1</b>	Regulator	25
<b>2</b>	Science/evidence gatherer	20
<b>3</b>	Government advisor	18
<b>4</b>	Policy developer	15
<b>5</b>	Stakeholder influencer	12
<b>6</b>	Consumer influencer	5
<b>7</b>	Trade assurer	5

**Principles and weightings** (no maximum)

	<b>Principle</b>	<b>Weight</b>
<b>A</b>	Our efforts will be focused on activities with greatest impact on safety & standards to protect consumers in Scotland	38
<b>B</b>	We will prioritise investment to deliver increased effectiveness & efficiency	20
<b>C</b>	We will meet statutory requirements following an assessment of the minimum standards that achieve that outcome	15
<b>D</b>	*We will undertake new in year activities only if they can be shown to be more important than existing plans	15
<b>E</b>	We will consider decisions through the lens of reputational risk to & influence of FSS	12

\* was parked as a process question rather than applicable now



**ANNEX B: Functions proposed as 'MUST DO'**
**SAFER Programme**

ID	FUNCTION / TASK	TOTAL Score
LAD11	<b>SAFER Programme (Scottish Authorities Food Enforcement rebuild)</b> Develop and Implement a revised food law enforcement delivery model to protect public health and the reputation of Scotland's Food & Drink and FSS; Ensure appropriate level of resourcing is available to undertake the necessary controls; Modernise the regime, and target resources at high risk and poor compliance; Utilise digital technology to enable truly intelligence led intervention.	142
RSP24	<b>SAFER programme - Food Law Business Portal:</b> Digital Development: Collection of new and modified food business data into Scottish National Database (SND) and passing on the new / updated data to the relevant Local Authority (LA). Introduction of new premises types, and new data such as High Risk foods and processes.	142
SC15	Development and maintenance of the Scottish Food Sampling Database	142
SC10	<b>SURVEILLANCE:</b> Food sampling and surveillance - commissioning of surveys to collect data on the prevalence of microbiological and chemical contaminants in food products sampled in Scotland. Supports risk analysis, horizon scanning, targeting of official controls	142
RSP15	<b>Penalties &amp; Sanctions: Compliance Notices:</b> Production of Scottish Statutory Instrument (SSI) to introduce new Compliance Notice enforcement tool for food standards offences	137
RSP16	<b>Penalties &amp; Sanctions: Fixed Penalty Notices:</b> Production of SSI to introduce new Fixed Penalty Notices (FPNs) enforcement tool	137
RP36	<b>Penalties &amp; sanctions work</b>	137
RSP05	<b>Regulatory Assurance: Intelligence from Voluntary Third Party Assurance (vTPA):</b> Set up data flows with vTPA providers to enable data sharing to SND to support Reg. Assurance Phase 1	127
RSP10	<b>Regulatory Assurance: Intelligence from vTPA:</b> Set Establishing data sharing agreements with vTPA scheme providers and subsequent implementation of data sharing programmes - supporting phase 1 Reg. Assurance	127
RSP09	<b>Regulatory Assurance: Earned recognition:</b> Develop proposal for utilisation of vTPA data for implementation of earned recognition for Scottish food businesses.	127
RSP11	<b>Regulatory Assurance: Earned recognition:</b> Produce Earned Recognition framework for LAs (Phases 2-5 Regulatory Assurance)	127
RSP12	<b>Regulatory Assurance: Earned recognition:</b> Assess the feasibility of extension of earned recognition for the Trade Assurance Scheme for Combinable Crops (TASCC ) to cover the use of combinable crops for food (cooperative work with FSA) - needs to map satisfactorily against the relevant food law requirements	127
RSP26	<b>Regulatory Assurance: Earned recognition:</b> Expansion of scope of Red Tractor MoU to Scotland for dairy, poultry and fresh produce	127
RSP27	<b>Regulatory Assurance: Earned recognition:</b> Update Food Law Code of Practice (FLCoP) in relation to TASCC and Red Tractor scope expansion	127
RSP29	Development of Framework Agreement for remote inspections (Primary Production)	118
RSP06	<b>CIS Development:</b> Complete FHIS data comparison and cleanse in both SND, & in website publication systems (FSA & FSS)	112
RSP07	<b>CIS Development:</b> Deliver on National publication of FHIS data (removing LA burden) (Q2)	112
RSP14	<b>CIS Development:</b> Social science research project to establish what consumers want included in a Consumer Information Scheme (CIS)	112
RSP28	<b>CIS Development:</b> Based on high level principles and outcomes of research project, scope out options for CIS digital solutions (Q4)	112
RSP21	<b>FLCOP – Phase 3 Review:</b> Develop options and implement new digital solution for hosting FLCoP	110
RSP17	<b>FLCOP – Phase 3 Review:</b> Republication of Overarching and Interventions Code with updated legal references following EU Exit	102
RSP18	<b>FLCOP – Phase 3 Review:</b> Review, update & publish new Administration & Service Planning Code (Q3)	102
RSP19	<b>FLCOP – Phase 3 Review:</b> Draft & publish new Enforcement FLCoP (Q4)	102
RSP20	<b>FLCOP – Phase 3 Review:</b> Draft & publish new Approvals FLCoP (Q4)	102
LAD25	<b>FLCOP – Phase 3 Review:</b> Develop Imports Code of practice and associated guidance and manage this package	102
RSP08	Develop a National Framework for OC charging, along with a proposal for implementation	44
LAD	OC: Food Delivery	

**FOOD CRIME & INCIDENTS**

ID	FUNCTION / TASK	TOTAL Score
CM09	<b>Incident Management:</b> Incident communications	148
RP13	<b>Incident Management:</b> Support & Advice to incidents and enforcement and feed delivery colleagues; general responsibility to protect consumers' interests in relation to food. Food Safety Act 1990; General Food Law Regulation 178/2002; Food (Scotland) Act 2015	148
LAD13	<b>Incident Management:</b> Lead on FSS resilience requirements and activity and plan and manage an effective emergency exercise programme of work	148
SFCIU04	<b>Incident Management: Develop cross office &amp; external delivery plan</b> to support the FSS incident prevention strategy for implementation during 2022/23.	148
SFCIU11	<b>Incident Management: Implement a system to share incident causation factors</b> with industry in partnership with FSA, to reduce recurring themes. Initial costs funded by FSA	148
SC27	<b>Incident Management:</b> Provision of scientific advice and risk assessment to support the investigation and management of food incidents	148
SFCIU08	<b>Investigation of Food Crime: Joint UK Lead Operation Opson</b> Operation OPSON is an Interpol/ Europol joint annual operation targeting fake & substandard food & beverages	117
SFCIU09	<b>Investigation of Food Crime: Develop &amp; deliver EMPACT op. action plans</b> in partnership with NFCU, Europol, Interpol & other international participating countries - allows SFCIU to be involved in influencing food fraud activity at a European level (funded by Europol)	117

**DATA & DIGITAL**

ID	FUNCTION / TASK	TOTAL Score
RSP01	<b>SND Maintenance &amp; development:</b> Deliver on Data cleansing & data enrichment project for SND to enhance search facilities, increase intelligence, accurately locate food businesses (geo-tagging), improve Data Accuracy & introduce LA Verification of data, ID of sensitive / private businesses, and facilitate MIS upgrades at LAs	142
RSP02	<b>SND Maintenance &amp; development:</b> Further develop SND Reporting for FSS branches	142
RSP03	<b>SND Maintenance &amp; development:</b> Produce a rationalised LA Approved Premises lists into one accurate list with relevant processing capabilities in SND	142
RSP04	<b>SND Maintenance &amp; development:</b> Develop online SND Training course	142
CM06	Website (Requirement to refresh the FSS website which will have a considerable cost depending on requirements)	127
NSP03	<b>Intake 24:</b> SHEs Intake24 data analysis of discretionary foods from 2021 survey	88
NSP04	<b>Intake 24:</b> Contract to run three surveys (Children and young people survey - late 2022 / early 2023)	88
GI02	<b>Data &amp; Digital Strategy: Finalise Digital strategy and move toward implementation</b> Launch and implement a digital and data strategy for FSS, including a range of digital projects which aim to improve business efficiency, better leverage our own and other data sources, deliver value to FSS stakeholders in new ways, and optimize our use of FSS resources across all digital and data endeavours.	44
SC16	<b>Data &amp; Digital Strategy:</b> Support for the development and implementation of an organisational Digital/Data strategy for FSS - heavily reliant on expertise from data scientists to support all 3 pillars of the strategy.	44

**OFFICIAL CONTROLS**

ID	FUNCTION / TASK	TOTAL Score
OD05	Delivery of Phase 4 of Shellfish Monitoring Classification (SMC) and Shetland Pilot	142
OD21	Undertaking the Internal Monitoring Procedures for OC Delivery (reality checks on staff performance, OWS audits, VA review of ENF, AW, ABP entries and checks in hubs & shellfish)	135
SC09	Scientific support for animal feed delivery - sampling plans, risk assessments and technical advice	118
LAD01	Delivery of feed controls across 9 Local Authority Areas	115
OD01	<b>Official Controls:</b> Delivery of all OCs in Meat Plants	115
OD04	<b>Official Controls:</b> Delivery of Shellfish Monitoring Programme	115
OD14	<b>Official Controls:</b> Administrate the Certificate of Competence (CoC), audit & approvals/authorisation processes.	115
OD15	<b>Official Controls:</b> Delivery of Audits (including Unannounced Inspections) & Approvals in Meat plants	115
OD22	<b>Official Controls:</b> Wine Standards [FSS are Competent Authority (same as for Meat plants, Fish Hubs & Shellfish) we are about to undertake programme of inspections including 80 traders & bonded warehouses looking at illegal labelling, adulteration, allergen information, alcohol content]	115
SC28	Provision of risk assessment, data analysis and scientific advice to underpin the design of FSS official control monitoring programmes for shellfish (biotoxins, shellfish classifications) £80k to commission the biotoxin risk assessment (every 3 years)	115
OD12	Maintain, update and publish/communicate the Scottish Manual of Official Controls and all other technical guidance for AOs	102
LAD12	Manage Approved Establishments and the Official Control Verification system applied in this sector	95
OD08	<b>Stakeholder engagement:</b> Engagement with Stakeholders across industry, SG, UKG and LAs in relation to setting of the charging rate for 2022/23	70
RP35	Feed additive trials	63

**DIET AND NUTRITION**

ID	FUNCTION / TASK	TOTAL Score
NSP08	<b>Government advice: Out of Home (OOH):</b> Evidence Supporting Nutrition Policy & Development: Code of Practice for children's menus - OOH action plan	100
NSP09	<b>Government advice: Out of Home:</b> Evidence Supporting Nutrition Policy & Development: Eating Out, Eating Well framework development - OOH action plan	100
NSP10	<b>Government advice: Out of Home:</b> Evidence Supporting Nutrition Policy & Development: Monitoring and evaluation of OOH calorie reduction measures - OOH action plan	100

**GENERAL**

ID	FUNCTION / TASK	TOTAL Score
UKIR07	<b>Government Advice:</b> Deliver FSS Technical input to Free Trade Agreements (FTA) trade negotiations (principally SPS Chapters) coordinating with SG food and drink trade leads	128
RP29	<b>Section 42:</b> Trade Agreements - Review from the food safety/ human health interests	128
UKIR10	<b>Section 42:</b> Delivery of FSS contributions to s.42 reports	128
SC19	<b>Laboratory Provision:</b> Designation of Official Laboratories; Designation of National Reference Laboratories; Oversight of UKAS audits of official laboratories (in partnership with FSA to fulfil competent authority duties under Retained Regulation 2017/625); Co-funding of NRLs and LGC initiatives aimed at supporting capacity and capability on food authenticity in the UK.	122
UKIR08	<b>Government Advice/International Obligations:</b> Coordinate and develop FSS input to UK positions on World Trade Organisation (WTO) issues / Specific Trade Concerns (STC)s and delivery of FSS WTO notifications on Sanitary and Phytosanitary Measures (SPS) & & Technical Barriers to Trade (TBT) measures liaising with FSA, Defra & DiT NEPs	113
SC06	Development of tailored, evidence based strategies for interventions aimed at reducing the impacts of foodborne illness in Scotland (ensuring interventions and risk management/communication are underpinned by science & evidence). This includes on-going engagement with FSA and PHS on UK and Scottish trends in infectious intestinal disease (IID), estimations on the burden of foodborne IID, scientific analysis of epidemiology and microbiological data on attribution and evidence on efficacy of interventions from farm to fork.	107

**ANNEX C: Functions proposed as 'STOPPED'**

ID	FUNCTION / TASK	TOTAL Score
RSP13	Republish the refreshed Regulatory Strategy to reflect the re-prioritisation of work streams now delivered under the programme of work (Q3) (dependant on Board regarding SAFER programme)	137
AA04	<b>International Assurance: Imports (Outward Missions):</b> FSS main point of contact for the UK Office of Sanitary & Phytosanitary Trade Assurance (UKOSPSTA) with regard to new market access requests (Products of Animal Origin (POAO) only).	128
SC25a	<b>International Assurance: Imports (Outward Missions):</b> Scientific support for imports (outward missions)	128
UKIR09	<b>CODEX:</b> Delivery of FSS coordination on engagement/ involvement in Codex	113
RP25	<b>CODEX:</b> Support to Codex and other international discussions (policy papers and guidance work relating to labelling and composition standards, contaminants and food hygiene and safety)	113
RP33	<b>Support &amp; advice for imports/exports:</b> OCR related questions/opinions/work requests for FSS & SG	113
RP34	<b>Support &amp; advice for imports/exports:</b> Requests for advice & opinion to FSS imports & exports team, SG, SGLD, including EHCs and Notes for Guidance & Borders Operating Models	113
UKIR11	<b>EU alignment facilitation:</b> Develop, maintain and management of EU food law monitoring tools / tracker to support EU alignment decisions	111
RP09	<b>EU alignment facilitation:</b> Individual policy analysis of EU changes in food/feed law to proactively make recommendations to align based on SG policy	111
NSP07 (a)	Procuring new evidence to support Nutrition Policy & Development: Mandatory Calorie Labelling (MCL).	100
LAD36	Manage and lead on LA engagement via events, workshops etc.	92
NSP13	<b>Consumer Research: Healthy eating campaign</b> (awaiting confirmation on whether this goes ahead)	88
NSP11 (a)	Procuring new evidence to support work on restricting HFFS promotions	68
CM05	Educational Tools	55
CM08	REHIS / FSS Schools Initiative (subsequent to the meeting and paper publication wording has been amended)	55
RP27	Legislation for which the SG has policy responsibility [wine standards, beef labelling, egg and poultry marketing standards, animal health and welfare, animal by products]	42
RP30	Potential for certain retained EU legislation in relation to POAO import controls but made under 178/2002 which could/should be SG lead. Whilst made on public safety grounds, FSS is not lead for POAO imports	42
NSP19	Support winter Vitamin D campaign	17

**ANNEX D: Functions proposed as 'PAUSED'**

ID	FUNCTION / TASK	TOTAL Score
RP14	Reviewing existing guidance and producing new guidance, including updating and maintaining the Scottish food and feed law guide	137
RP03	Involvement in CF/Policy discussions which look to manage divergent policy approaches (genome editing) – this also seeks to address a strategic risk on the risk register.	131
RP23	<b>Precision Breeding Bill:</b> More generally FSS involvement / participation on changes taking place on England only basis) - linked to Novel Foods review	131
SC20	<b>Laboratory Provision:</b> Strategy for safeguarding scientific services for food and feed in Scotland including review of PA laboratory services and contributions to wider SG programmes on laboratory infrastructure.	122
SFCIU06	<b>UK Food Security Report</b>	113
SC08	Development and maintenance of a horizon scanning function for FSS	111
SC07	A dedicated scientific advisory function to support policy development and enforcement delivery on allergens and keep pace with FSA's hypersensitivity programme	107
RP26	<b>Out of Home:</b> Policy Support for the Out of Home nutrition related work	100
LAD33	<b>Allergens:</b> Lead on implementation of nutrition Policy to be delivered by LAs, including management of the Menucal tool, input to SG direction of mandatory calories labelling etc.	100
NSP05	<b>Consumer Research: Attitudes to diet and health survey</b> - (consumer survey) – 50k is this year	88
NSP01	<b>Government advice: Monitoring &amp; Surveillance: Retail purchase</b> data to support SG policy including Public health Bill on restricting HFSS promotions	88
NSP02	<b>Monitoring &amp; Surveillance: Out of home</b> consumer purchase data to support SG policy development on mandatory calorie labelling and OOH action plan	88
LAD07	<b>Exports (Operational Framework):</b> Develop Exports Code of practice and associated guidance	77
LAD08	<b>Exports (Operational Framework):</b> Manage third Country listings and approved exporting establishment lists	77
OD23	Participate in the delivery to export approvals, export audits & support for DEFRA with technical input to export missions/ Inward missions.	75
SC21	Contribution to AMR, One Health and Public Health Microbiology Strategies in Scotland and input into the UK action plan on antimicrobial resistance	62
CM01 (b)	Paid advertising campaigns	55
SC05	Provision of risk assessment and scientific advice to support verification requirements for export health certification (linked to exports)	50
NSP12	<b>Eat Well Your Way:</b> (hosting & maintenance , implementing feedback/improvements - visual & function vs content )	49
UKIR05	Identify opportunities for improved, formalised inter-governmental relations through e.g. production of gap analysis of MOU/SLA provision across FSS	44
UKIR12	<b>Sustainability Strategy:</b> Development & delivery of sustainability plan & ongoing monitoring/reporting	44
RP32	<b>Sustainability Strategy:</b> Waste and sustainability, supports SG net zero & climate change e.g. methane inhibitors, alternative proteins (specifically insects), work with Zero Waste Scotland (ZWS)	44
SC17	<b>Sustainability Strategy:</b> Represent FSS interests in cross government strategies on food waste and climate change	44



**ANNEX E: Functions proposed to 'CONTINUE BUT WITH AN EXIT STRATEGY OR SCALED APPROPRIATELY'**

ID	FUNCTION / TASK	TOTAL Score
AA01	<b>Domestic Assurance (External Audit) LA performance monitoring</b> <ul style="list-style-type: none"> <li>• Deliver Audit of Enforcing Authorities (Local Authorities). The power to set standards, monitor and audit the performance of Local Authorities was conferred on FSS by Sections 3 and 25 of the Food (Scotland) Act 2015 and Regulation 7 of The Official Feed and Food Controls (Scotland) Regulations 2009.</li> <li>• Article 6 of Retained Regulation EU 2017/625 (Competent authorities shall carry out internal audits or have audits carried out on themselves) also delivered on behalf of LAs as we have the overarching performance monitoring role.</li> </ul>	142
AA02	<b>Domestic Assurance (Internal Audit) - Audit of FSS official control delivery</b> <ul style="list-style-type: none"> <li>• Deliver Audit of FSS delivery of official controls as required by Article 6 of Retained Regulation EU 2017/625. (Competent authorities shall carry out internal audits or have audits carried out on themselves).</li> <li>• Sections 3 &amp; 25 of the Food (Scotland) Act 2015 and Regulation 7 of The Official Feed and Food Controls (Scotland) Regulations 2009 in relation to performance monitoring also apply as FSS is an enforcing Authority.</li> </ul>	142
SC11	<b>RESEARCH:</b> Research and evidence reviews aimed at supporting the development of interventions for improving food safety and standards (e.g. research aimed at the development of new testing methods, and evidence to support the development of guidance and tools for the food industry and enforcement such as the smoked fish tool, guidance on safe cheese production, STEC contamination risks in wild venison)	142
OD06	<b>Domestic Assurance: Internal audit:</b> participate in relevant internal audits and ensure corrective actions are implemented.	142
RSP22	<b>Penalties &amp; Sanctions: Compliance Notices:</b> Implement new compliance notice in LA MIS and SND	137
RP07	Liaison with policy/science/risk assessment colleagues in FSS, FSA & OGDs on risk assessment & risk management work - Routine Risk Analysis issues.	128
SC12	<b>RESEARCH:</b> Research and evidence reviews aimed at understanding the sources and burden of foodborne illness in Scotland (including IID and allergy/hypersensitivity). This work would include analysis of epidemiological data on human cases, typing and sequencing of pathogens in humans and food to understand the attribution of IID.	126
SC13	<b>RESEARCH:</b> Social research aimed at understanding the attitudes and behaviours of consumers and food businesses in Scotland. The outputs of this work are used to inform advice on Other Legitimate Factors (OLFs) for risk analysis, consumer engagement, comms and marketing and tracker design, contributions to the FSS/FSA annual report, FSS strategies on diet and foodborne illness reduction, and regulatory strategy (e.g. development of a new consumer information scheme)	126
SC14	<b>RESEARCH:</b> Social research aimed at understanding the impact of future food chain technologies on the Scottish population. The outputs of this work are used to inform advice on OLFs for risk analysis, policy development on anticipatory regulation (e.g. on precision breeding, alternative proteins), nutritional advice (ultra-processed foods), contributions to the FSS/FSA annual report)	126
SC01	<b>Risk Assessment:</b> Delivery of risk assessment (RA) functions to ensure FSS contributes to the UK risk analysis process used to inform proposed changes to amend retained EU law. This includes oversight of issues on the tracker to identify where there is a need to contribute data and evidence relating to Scottish interests, input into the development of problem formulation statements, supporting FSA with research & drafting of RA documents, and, where appropriate leading the production of RAs on behalf of FSS and FSA.	125
SC02	<b>Risk Assessment:</b> Input into the review of scientific dossiers and ensuring FSS has oversight of risk assessments to inform applications being processed for authorisation through the FSA's regulated products service.	125
SC03	<b>Risk Assessment:</b> Social science advice and support on evidence relating to Other Legitimate Factors (OLFs) which are relevant to ensure the interests of Scottish consumers are taken into account in risk management decision making	125
SC04	<b>Risk Assessment:</b> Input into FSS and FSA Risk Analysis and Regulated Products Governance/Ways of Working - facilitated by WRG and RMG	125
SFCIU01	<b>Investigation of Food Crime: Develop &amp; Implement food crime prevention strategy,</b> in relation to food & feed through analysis, education & a partnership working structure. Delivery of food crime workshops for industry tied to vulnerability tool (16k)	125
SFCIU02	<b>Investigation of Food Crime: Develop &amp; Implement food crime prevention strategy:</b> Delivery of food crime workshops for industry tied to vulnerability tool (16k)	125
RP02	<b>Novel Foods Review:</b> Proactive involvement in the FSA project to review the Novel Foods regime.	123
RP18	<b>Novel Foods Review:</b> Anticipatory Regulation - linked to review of Novel Foods	123
RP17	<b>Allergens:</b> Policy development and support around Allergens Plan and keeping pace with FSA Hypersensitivity programme	122
LAD14	<b>Allergens:</b> Lead on delivery of Allergens Policy and strategy, to ensure public protection and support LAs and FBOs, development of video training resources	122
NSP14	<b>Government Advice: Folic acid fortification of flour</b> (Lead 4 nations monitoring group; Folic acid fortification (development of submission on monitoring proposals, PHN representation re: consultation responses))	118
SFCIU10	<b>Investigation of Food Crime: Chair of Global Alliance</b> on Food Crime & delivery of GA strategic objectives & currently secretariat functions	117
RP01	<b>Regulated Products:</b> (various regimes have set timescales for validation stages e.g. 4 months for Traditional Food Notifications, completion of scientific assessments but periods vary; feed and feed additives). Includes RPAT functions and Policy development/risk management functions.	116
RP04	<b>Risk Analysis:</b> Risk analysis work (SSI), following agreed FSA and FSS processes & governance arrangements	116
RP19	<b>Risk Analysis &amp; Regulated Products:</b> Policy Division staff time for involvement in Risk Analysis and Regulated Products Governance/Ways of Working - facilitated by WRG and RMG (Inc. reporting)	116
LAD09	<b>Imports (operational framework):</b> Lead on development of Import Target Operating Model for Scotland	115
LAD10	<b>Imports (operational framework):</b> Manage and co-ordinate BCP applications and approval process and sign off on behalf of FSS any BCP approvals	115
LAD22	<b>Imports (operational framework):</b> Lead on different SFELC Import and Exports working group	115
LAD23	<b>Imports (operational framework):</b> Lead on FSS Imports – co-ordinate activity, lead LA engagement, attend cross government working groups	115
LAD24	<b>Imports (operational framework):</b> Administer the FSS Imports Working Group	115

ID	FUNCTION / TASK	TOTAL Score
SC26	<b>Imports (operational framework):</b> Scientific support for FSS import strategy - sampling plans and laboratory engagement/commissioning	115
OD02	<b>Official Controls:</b> Delivery of EHCs in Fish Export Hubs & meat plants and Game Handling Establishments.	115
NSP07 (b)	Mandatory Calorie Labelling (MCL): Staff time for supporting SG consultation & policy instructions incl. evidence reviews	100
UKIR01	<b>Frameworks:</b> Liaison with FSS & OGDs on framework implementation & delivery of framework obligations	90
UKIR02	<b>Frameworks:</b> Delivery of Framework reporting (future function)	90
UKIR13	<b>Frameworks:</b> Framework liaison (working with UK counterparts on development, & delivery of final frameworks)	90
RP10	<b>Frameworks:</b> Development of the provisional frameworks to date - including supporting policy groups/discussion and work plans with Defra, DHSC and FSA.	90
SC23	<b>RESEARCH:</b> Engagement with SG, UK funding councils & institutions and in-kind contributions to the development of cross government research in areas of FSS interest e.g. PATHSAFE project, RESAS Strategic research programmes, UKRI Transforming Food Systems & Food Safety Network	82
NSP11 (b)	Restricting HFFS promotions: the provision of staff time for support to SG for Bill progress legislative aspects	68
RP20	Nutrition and Health Claims	58
NSP06	<b>MenuCal</b> (Implement recommendations from results of sampling survey; review of Menucal; active promo of use of the tool & rebrand; Composition of Foods Integrated Dataset (Cofid) update; management of Menucal MOU) [provision of support of menu calorie labelling (CPD element)]	49
AA03	<b>International Assurance (underpinned by Domestic Assurance): Exports (Inward Missions)</b> FSS main point of contact for Missions from Third Countries (including the EU) - coordinating and providing support and guidance to FSS/LAs and Food/Feed Business Operators and preparation for all inward missions in response to Defra requests.	57
SC25b	<b>International Assurance (underpinned by Domestic Assurance): Exports (Inward Missions):</b> Scientific support for exports	57
RP31	Emergency Import Safeguard Declarations on specific products from specific countries made under TARP	42

**ANNEX F: Functions proposed to 'CONTINUE as PROVIDE CORPORATE SUPPORT'**

ID	FUNCTION / TASK	TOTAL Score
CM07	<b>Consumer Research</b>	<b>126</b>
UKIR03	<b>FSS/FSA Joint Annual Report:</b> Coordination and delivery of FSS/FSA joint annual report (scoping, project team participation etc.)	<b>113</b>
RP15	<b>FSA/FSS Annual report</b>	<b>113</b>
SC18	<b>FSS/FSA Annual Report:</b> Scientific support for the FSS/FSA annual report and MOU	<b>113</b>
SFCIU05	<b>FSA/FSS Annual Report:</b> incl. chapter co-ordination	<b>113</b>
CM02	Business Influencing	<b>112</b>
LAD30	<b>FLCOP Phase 3 Review:</b> Maintain Codes of practice and associated guidance documents [moved to put through model at workshop]	<b>102</b>
CM03	Public Affairs	<b>100</b>
CM04	Wider Stakeholder Events	<b>92</b>
UKIR04	<b>FSA/FSS MOU:</b> Review and deliver updated FSA/FSS MOU – internal analysis and cooperation with FSA (annual)	<b>87</b>
RP28	<b>FSA/FSS MOU:</b> Review of MOU with FSA	<b>87</b>
UKIR06	<b>Stakeholder engagement:</b> Supporting Chair, Board & ELT to get more from their external engagement through, e.g., the development of stakeholder engagement plans	<b>67</b>
CM01 (a)	Consumer Influencing (incident communications, e.g. listeria, food safety messages relating to foodborne illness and allergy / recall alerts)	<b>55</b>