

DEVELOPING A STRATEGIC APPROACH TO FOOD SURVEILLANCE

1 Purpose of the paper

- 1.1 This paper is for **discussion** and **decision**.
- 1.2 Outcome 2 of Food Standards Scotland's (FSS's) Corporate Plan includes a commitment to develop a new Food Surveillance Strategy for Scotland, comprising a horizon scanning capability and employing data collected by FSS, Local Authorities (LAs), industry and others, to identify emerging risks and assess the safety and authenticity of foods produced and sold in Scotland.
- 1.3 The draft Strategy laid out in this document sets out the approach FSS will take towards meeting Scotland's needs for future food surveillance and aims to address key recommendations made by The Scudamore Expert Advisory Group. The Board will wish to be aware that an implementation plan has also been drafted, detailing the work that we propose to take forward to deliver the Strategy over the next five years. The Strategy and implementation plan will be finalised during the first Quarter of 2017/18, following the Board's discussion and consultation with key stakeholders on the proposed Strategy.
- 1.4 The Board is asked to:
 - **Discuss and provide a view** on the proposed strategy and the priority areas of work that have been identified to deliver our model for future food surveillance;
 - **Note** that we will undertake a targeted consultation to seek stakeholder views on the proposed strategy, our intention being to bring the finalised Strategy back to the Board later this year for agreement;
 - **Agree** that the Executive should take responsibility for resourcing and delivering this strategy, ensuring that the Board is updated on progress.

2 Strategic Aims

- 2.1 The development of a Food Surveillance Strategy for Scotland supports FSS Strategic Outcomes 1 – Food is Safe, and 2 – Food is authentic, and is a key activity which FSS has committed to in its Corporate Plan to 2019¹.

3 Background

- 3.1 The development of a Food Surveillance Strategy was a key recommendation of The Scudamore Expert Advisory Group, which was established by Scottish Ministers in February 2013 to review lessons learned from the horsemeat incident and identify the ways improvements could be made to food and feed standards in Scotland². The final update on progress against each of the Scudamore recommendations was provided to the Board on 19 October 2016³, with a commitment to present, at this meeting, proposals for a Food Surveillance Strategy that would be integrated into the future delivery of corporate objectives.
- 3.2 The draft Food Surveillance Strategy for Scotland is presented at Annex A of this paper. It considers **why** food surveillance is needed and the rationale for our proposed approach, **what**

¹ <http://www.foodstandards.gov.scot/shaping-scotlands-food-future-our-strategy-2021>

² <http://www.gov.scot/Resource/0042/00426914.pdf>

³ <http://www.foodstandards.gov.scot/sites/default/files/FSS%20Scudamore%20Paper%20161004.pdf>

information needs to be collected, **how** that information should be generated and analysed, and **who** we need to work with to ensure intelligence is shared effectively and appropriate action is taken. It also considers timelines relating to **when** the strategy will need to deliver tangible outputs in order to be effective.

4 Discussion

- 4.1 The strategy describes the approaches designed to generate the information and intelligence required to identify risks to the safety and authenticity of food and feed produced or sold in Scotland and is based on the findings of the research project titled 'Benchmark Standards for a World Recognised Food Surveillance System' (FSS's Benchmarking Review)⁴. This project was commissioned by FSS in 2014 to address recommendation 12 of the Scudamore report⁵, and provided a range of proposals for strengthening current surveillance arrangements in Scotland.
- 4.2 The surveillance model outlined in the strategy is intended as an initial framework to guide the development of intelligence relating to food/feed safety and authenticity through structured approaches for the collation, analysis and interpretation of information sources. It is envisaged that the model will evolve over time as FSS implements its strategic plan, develops policy to enable it to deliver new functions and refines its operational activities in line with budgetary constraints. The strategic aim acknowledges the potential for Scotland, as a relatively small country, to develop an internationally recognised surveillance model which aligns with both the size of its population and the nature and scale of its food economy. Scotland's governance arrangements offer a potential strength in terms of the practicalities of working with Local Authorities (LAs) and other bodies with local knowledge and close relationships with communities across the country. A central plank of the strategy is therefore to make the best use of information collected by FSS and others for the common good.
- 4.3 The development of a world-recognised food surveillance system is a long-term ambition for FSS, reliant on the achievement of a number of challenging inter-dependent objectives:
- Development of an effective horizon scanning framework within FSS with the capability to interpret data and evidence from a diverse range of sources (scientific, economic, investigative) to identify trends and emerging risks, and ensure surveillance activities are effectively targeted;
 - Promotion of resilient, co-ordinated and integrated laboratory provision for food and feed testing in Scotland;
 - Establishment of trusting and productive relationships with partners across Government, the public sector and the food industry, which promote the sharing of data and intelligence;
 - Development of new data management systems which provide secure platforms for recording and sharing intelligence;
 - Development of data standards that will facilitate the sharing and/or comparison between data held by FSS and that held externally;
 - Establishment of robust analytical capability within FSS which is capable of translating data and information into robust and usable intelligence.
- 4.4 A more detailed implementation plan has been developed which sets out how these objectives will be delivered over the next five years. This will be taken forward as a multidisciplinary project, integrating FSS science, regulatory policy, enforcement and food crime expertise to develop a systematic approach for the targeting, planning and co-ordination of our future surveillance activities.

⁴<http://www.foodstandards.gov.scot/news/scotlands-food-surveillance-systems-benchmarked-new-report>

⁵ <http://www.gov.scot/resource/0042/00426914.pdf>. The full list of Scudamore recommendations relating to food surveillance are presented in Annex 1. Recommendation 12 reads: '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.'

5 Financial and resource implications for FSS

- 5.1 In addition to existing staff resource committed to this area of work, delivery of the strategy will be dependent on on-going financial commitment for contracted IT infrastructure projects, research and surveillance activities required to underpin our evidence base, and the recruitment of new expertise to support data management, analytics and horizon scanning. Accurate forecasting of costs across all areas of the strategy is not possible but estimates can be made in the main areas associated with significant additional anticipated costs compared with current expenditure. It has been estimated that the average costs for implementing the strategy over the next five years would represent a net annual increase of approximately £250,000 compared with surveillance expenditure in 2016/17. This includes an annual cost of approximately £40,000 for one additional member of staff.
- 5.2 This estimate is based on the assumption that FSS will maintain current levels of grant funding (£150,000 per annum) to support LA sampling programmes over the next 5 years. However, commitments beyond 2017/18 will depend on the long-term sustainability of future LA funding in light of other FSS priorities, and/or the development of alternative approaches that will provide adequate food surveillance coverage.
- 5.3 On current projections the Executive considers that there is sufficient flexibility within our current work programme and the implementation plan to reprioritise and ensure that there is sufficient resource to implement the surveillance strategy as envisaged.

6 Stakeholder Consultation

- 6.1 The Strategy has not yet been subject to external consultation, although the proposals have been informed by discussions with key stakeholders including the FSA and The Scottish Food Enforcement Liaison Committee (SFELC). Pending agreement by the Board, we propose to initiate a targeted consultation with interested parties during the first quarter of 2017/18, to seek views on the proposed strategy and explore opportunities for collaboration.

7 Finalising the Strategy and Future Progress Reporting

- 7.1 The implementation plan for delivering the strategy will be finalised to take account of feedback from the Board and stakeholder consultation. Achieving the vision for food surveillance described in this paper is a cross-cutting and long-term project which will be critical to the effective delivery of FSS's overall Strategy. It will therefore be necessary to manage delivery at a strategic level, and to ensure deliverables are monitored in a structured manner.
- 7.2 The Strategy sets out priority workstreams and what we would expect to achieve in the short, medium and longer term. We propose to keep the Board informed of progress on an annual basis, through reporting on delivery of the implementation plan and the outputs of horizon scanning and surveillance activities.

8 Identification of risks and issues

- 8.1 This strategy represents a significant change to the way that FSS (and the FSA) in Scotland has previously approached food surveillance, and effective implementation will have implications for staff resourcing. Dedicated organisation-wide support will be required to manage the development and on-going application of systematic and robust horizon scanning processes which inform surveillance priorities and ensure activities are effectively co-ordinated and targeted.
- 8.2 It is important to recognise that the legislative, administrative and operational changes associated with Brexit are likely to have an impact on the ability of FSS to deliver this strategy. It

may therefore be necessary to prioritise objectives that will enable FSS to deliver a more achievable surveillance programme in parallel with our Brexit commitments.

9 Conclusion/Recommendations

9.1 The Board is asked to:

- **Discuss and provide a view** on the proposed strategy and the priority areas of work that have been identified to deliver our model for future food surveillance;
- **Note** that we will undertake a targeted consultation to seek stakeholder views on the proposed strategy, our intention being to bring the finalised Strategy back to the Board later this year for agreement;
- **Agree** that the Executive should take responsibility for resourcing and delivering this strategy, ensuring that the Board is updated on progress.

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23 February 2017

ANNEX A

Surveillance Strategy