

Annex 2 : FOOD STANDARDS SCOTLAND – OUR STRATEGY TO 2021

Our Purpose

- 1.1 FSS's purpose is defined in the Food (Scotland) Act 2015¹.
- 1.2 The 2015 Act gives FSS three *objectives*:
- to protect the public from risks to health which may arise in connection with the consumption of food;
 - to improve the extent to which members of the public have diets which are conducive to good health; and
 - to protect the other interests of consumers in relation to food;
- 1.3 In setting out our purpose, the Act provides FSS with the legitimacy to carry out activities to help achieve these objectives, and in doing so, to protect consumers and help them to have better health.
- 1.4 The Act also identifies a number of *general functions* for FSS, summarised below:
- a. to develop and help others develop policies on food and animal feed;
 - b. to advise the Scottish Government, other authorities and the public on food and animal feed;
 - c. to keep the Scottish public and users of animal feed advised to help them make informed decisions about food and feed stuffs; and
 - d. to monitor the performance of food enforcement authorities.
- 1.5 And FSS is defined in law as a 'competent authority' and an 'enforcement authority' to implement and monitor Scottish and EU food and feed regulations. This gives us a role as a *regulator* in relation to food and feed law.

Our Vision

- 2.1 It is clear from the statutory objectives in the Act that consumers – the public – should be at the heart of everything we do, and therefore FSS should put the consumer first and foremost. Putting the consumer first is the value that must be at the heart of FSS's vision: *to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers.*

The Food Landscape

- 3.1 Describing the food landscape now and in the foreseeable future is helpful in contextualising how we should translate our purpose into strategic priorities to 2021.
- 3.2 FSA in Scotland participated in the work to develop FSA's Strategy to 2020^{2,3}. That work involved wide-ranging analysis of the external landscape in relation to

¹ <http://www.legislation.gov.uk/asp/2015/1/contents/enacted>

² <http://www.food.gov.uk/sites/default/files/fsa141105.pdf>

³ <http://www.food.gov.uk/sites/default/files/fsa141105a.pdf>

the food supply, and identified that many different things are expected to affect the supply of food to the UK over the next 25 years or more, but that it is difficult to predict the pace and nature of these changes. Most of the factors identified as potentially having an impact on the supply of food to the UK as a whole are equally relevant to Scotland.

- 3.3 It is recognised that pressures on production systems and supply chains at home and elsewhere may have impacts on consumers. These pressures may be environmental, for example in relation to the availability of land, water and energy for growing and producing food, they may be demographic, such as increasing demand for food from a growing population or they may be economic, where market forces or the wider economic environment may encourage unscrupulous operators in food supply chains to cut corners. Whilst it is the responsibility of all food businesses in Scotland to produce and sell safe food, FSS has a role in ensuring that they meet these responsibilities, and to ensure that effective action is taken if and when they do not.
- 3.4 Political and structural factors are important context – nearly all food and feed law now originates from the European Union, so ensuring that FSS is well placed to reflect Scottish perspectives into developing EU policy at the earliest possible stage will be key to achieving some of our objectives. Locally, FSS is highly dependent on our partners in Scotland's 32 local authorities who are responsible for carrying out much of the 'on the ground' compliance and enforcement work. The future sustainability of these services, provided by skilled and competent teams and individuals, is key to our activities in protecting consumers, in an environment where resources to support these services are reducing.
- 3.5 FSS's primary concerns are protecting public health in relation to food safety and diet, and the other interests of consumers in relation to food, for example ensuring that consumers can have confidence that the food they buy is authentic and accurately labelled with information that they can understand and trust. In working to achieve these goals and putting the consumer interest first, we also have a responsibility to ensure that food businesses are treated fairly and that our regulatory functions are proportionate and do not add undue burden to industry. To underpin this we will develop a specific regulatory strategy which transparently outlines our approach to regulatory decision making and targets interventions in a way that effectively identify and dissuade non-compliance, while providing incentives and rewards for compliance.

Wider Food Policy in Scotland

- 4.1 The food and drink sector is a significant part of Scotland's economy. Employing some 350,000 people in Scotland, there are ambitions to grow the industry to £16.5 billion by 2017⁴. It was recently announced that Scottish food exports have surpassed £1.1 billion for the first time, with total food and drink exports valued at £5.1 billion in 2014⁵. These figures, extracted from official HMRC export statistics for 2014⁶, show that food exports grew by 3.5 per cent on 2013, driven primarily by an increase in fish and seafood, which was up £38m. The food and drink sector

⁴ <http://www.scotlandfoodanddrink.org/about-us.aspx>

⁵ <http://news.scotland.gov.uk/News/New-record-for-Scottish-food-exports-1933.aspx>

⁶ <https://www.uktradeinfo.com/Statistics/EUOverseasTrade/Pages/EuOTS.aspx>

therefore makes a significant contribution to the Scottish economy and has an important role to play in meeting the Scottish Government's purpose *to focus Government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth*⁷.

- 4.2 The importance of the food and drink sector to Scotland is widely recognised. Recipe for Success⁸, Scotland's first national food and drink policy, published in 2009, focused primarily on the economic growth of the sector. In 2014, the Scottish Government launched the next phase of its public dialogue on food and drink through its discussion paper 'Becoming a Good Food Nation'⁹. This paper recognised that whilst considerable progress has been and continues to be made, particularly in terms of economic growth, substantial challenges remain. These include areas where FSS can make an important contribution, for example in relation to diet and health, awareness about food and food culture. The aspirations of Good Food Nation recognise the need for a cross-policy approach, and FSS is ideally placed to contribute to some of these wider ambitions.

Food and Health

- 5.1 Scotland faces considerable challenges in relation to food and health. We know that poor diets are one of the most significant causes of ill health in Scotland and are a major factor in overweight and obesity. Poor diet contributes to Scotland having one of the highest prevalence rates of overweight and obesity in Europe¹⁰. Almost two thirds of adults in Scotland are either overweight or obese, and we know that progress in meeting the Scottish Dietary Goals is very slow¹¹. Health outcomes related to poor diet are well known – overweight and obesity contributes to higher risk of heart disease, stroke, Type 2 diabetes and some cancers. The Scottish Government's Obesity Routemap published in 2010¹² estimates that the direct NHS Scotland costs of obesity will almost double by 2030, and that using assumptions made in previous estimates, the total cost to Scottish society of obesity, including both direct and indirect costs, range from £0.9 billion-£3 billion.
- 5.2 Health outcomes related to diet are not just those to which overweight and obesity can contribute. Diets that are too high in salt can have harmful health outcomes – hypertension and stroke - and we know there can be health impacts – neural tube defects - in babies born to women with low folate status before and in the early stages of pregnancy.
- 5.3 Whilst the lack of progress towards meeting the SDGs is apparent amongst households in both the least and most deprived areas of Scotland, we know that households in the most deprived areas consume significantly less fruit and vegetables, oil rich fish and fibre, and consume more added sugars than households in the least deprived areas. We must ensure that our work will contribute to narrowing and not widening any inequality gaps, and to help guide us, we should undertake health equality impact assessments when developing policy.

⁷ <http://www.gov.scot/About/Performance/scotPerforms/purpose>

⁸ <http://www.gov.scot/Publications/2009/06/25133322/0>

⁹ <http://www.gov.scot/Publications/2014/06/1195>

¹⁰ <http://www.oecd.org/els/health-systems/Obesity-Update-2014.pdf>

¹¹ <http://www.foodstandards.gov.scot/monitoring-progress-towards-scottish-dietary-goals-2001-2012-report-2>

¹² <http://www.gov.scot/Publications/2010/02/17140721/0>

- 5.4 We know that the affordability of food is important to many consumers, and we know from recent surveys¹³ that a small minority of consumers feel that cost is a barrier to eating more healthily. FSS does not have the direct drivers to influence the cost of food, but could help consumers find ways to eat an affordable, healthier diet.
- 5.5 Health issues related to food are not just about diet – considerable numbers of consumers in Scotland suffer from food poisoning every year. Data derived from the FSA's second Infectious Intestinal Disease Study^{14,15} (IID2) suggests that there are an estimated 43,000 cases of foodborne illness in Scotland each year, of which 23,000 are thought to be caused by Campylobacter. And Scotland knows at first hand the devastating impact that foodborne illness can have – the E. coli O157 outbreak in Wishaw in 1996 claimed 21 lives¹⁶.
- 5.6 So, whilst Scotland's food and drink sector continues to flourish and makes a very important contribution to the Scottish economy, there remain significant challenges around food, diet and public health. FSS's efforts must be focussed on addressing these and other challenges related to the consumer interest, ensuring that consumers' health and wellbeing is protected, and that they can have confidence in the authenticity of food they buy – so to do this, we must put the consumer first.

Putting the Consumer First

- 6.1 To put the consumer at the heart of what we do, we need to understand what matters to consumers in relation to food. We also need to understand consumer attitudes and how consumers behave in relation to food. And we want consumers to understand us and what we do, so they can trust us. A 2015 survey shows that FSS is fortunate in inheriting from the Food Standards Agency in Scotland (FSAS) a strong level of trust from consumers in Scotland¹⁷.
- 6.2 We already know a lot about consumers attitudes and behaviours in relation to food, through the evidence and insight gathered as part of FSA, and as FSS, we will further expand and develop this understanding, with a clear focus on what matters to consumers in Scotland in how they think, act and behave on food issues. And it's important that we are doing this whilst looking forward, recognising that much is expected to change in the food chain over the years ahead.

What consumers think and how consumers behave

- 6.3 A challenge for FSS will be helping consumers to do things differently, when this is necessary to achieve our goals. For example, we have evidence that many consumers in Scotland understand what constitutes a healthy balanced diet and

¹³ <http://www.food.gov.uk/sites/default/files/scotland-executive-summary-food-and-you-2014.pdf>

¹⁴ <https://www.food.gov.uk/science/research/foodborneillness/b14programme/b14projlist/b18021>

¹⁵ https://www.food.gov.uk/sites/default/files/IID2%20extension%20report%20-%20FINAL%2025%20March%202014_0.pdf

¹⁶ The Pennington Group (1997) 'Report on the Circumstances Leading to the 1996 Outbreak of Infection with *E.coli* O157 in Central Scotland: The Implications for Food Safety and the Lessons to be Learned' Edinburgh: The Stationery Office

¹⁷ <http://www.food.gov.uk/science/research/ssres/publictrackingsurvey/biannual-public-attitudes-tracker-survey-may-2015>

report that they eat a healthy balanced diet¹⁸. Yet we also know that Scotland has a very poor record on dietary health and diet-related preventable illnesses.

6.4 This is a long-standing and complex problem, and one that will take time, commitment and effort across a wide spectrum to find and deliver solutions. By widening the remit of FSS and providing a specific statutory objective in relation to diet, the Scottish Parliament has set out its ambitions for change. Improving the health of the Scottish population by reducing the impact of preventable diet related diseases will require consumers to change what they do, but this alone will not deliver the improvement that is needed. We know that many people find it difficult to make the long-term changes that will reduce the likelihood of health risks associated with poor diet. And whilst there is much that individuals can do for themselves, rebalancing the diet must be a shared responsibility – shared between individuals, communities, the food and drink industry and Government. Behaviour change alone will not deliver the scale of change we seek, and that there are things that the food and drink industry can and should do to help people eat healthier diets.

6.5 So, being clear about our Purpose, and setting that in the context of the challenges that Scotland faces in a rapidly changing food landscape, we need to define what our priorities are to deliver our Vision - *to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers*

Our Strategic Priorities

7.1 To deliver our Vision - *to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers* - we propose the following six strategic outcomes:

1. Food is safe
2. Food is authentic
3. Consumers choose healthier diets
4. Responsible food businesses flourish
5. FSS is a trusted organisation
6. FSS is established, efficient and effective

7.2 Our draft Strategic Plan (Annex 3) sets out what we consider these outcomes to mean, and the key activities that we will undertake to help us achieve them. Achieving these high level outcomes will take FSS a long way to delivering our Vision. The Strategic Plan sets out what we will do over the first three years of the Strategy to move us towards these outcomes, and identifies key activities that will contribute to each outcome. And as part of the wider Scottish Administration, the work we do will also contribute to the Scottish Government's purpose.

Our Contribution to the Scottish Government's Purpose

8.1 As a non-ministerial office, FSS is not part of the Scottish Government, but is part of the wider Scottish Administration. As such, our activities should contribute to the Scottish Government's Purpose:

¹⁸<http://www.food.gov.uk/sites/default/files/scotland-executive-summary-food-and-you-2014.pdf>

'To focus Government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable growth.'

- 8.2 The Scottish Government has a well-developed National Performance Framework, which is founded upon an outcomes based approach. By FSS doing likewise, we will be well placed to contribute to this wider Purpose. This approach will also help to ensure we are aligned with the Community Empowerment (Scotland) Act 2015¹⁹ - making sure that our functions have regard to the National Outcomes, and put people in Scotland at the heart of what we do.
- 8.3 The National Performance Framework contains 16 National Outcomes. These outcomes describe what the Scottish Government wants to achieve, articulating the Purpose more fully. They help to sharpen the focus of government and bodies such as FSS, enabling the priorities to be clearly understood and provide a clear structure for delivery. The Scottish Government recognises that by organisations collaborating and working in partnership to achieve these outcomes together, we will collectively make Scotland a better place to live and a more prosperous and successful country.
- 8.4 The National Outcomes that are most relevant to FSS's purpose and remit are:
- We live longer, healthier lives
 - We have tackled the significant inequalities in Scottish society
 - Our children have the best start in life and are ready to succeed
 - We realise our full economic potential with more and better employment opportunities for our people
 - We live in a Scotland that is the most attractive place for doing business in Europe
 - We reduce the local and global environmental impact of our consumption and production
 - Our public services are high quality, continually improving, efficient and responsive to local people's needs.
- 8.5 The last two on the list above are outcomes that the Scottish Government expects all public bodies to contribute to. The last one is particularly relevant to FSS's strategic outcomes 5 and 6, and the penultimate one resonates with our duty to 'protect the other interests of consumers in relation to food', for example in how people in Scotland can have diets that are safe, healthy and sustainable now and in future. Table 1 shows how the FSS outcomes will contribute to the National Outcomes.
- 8.6 FSS's activities throughout the period of the Strategy must also reflect what Scottish Government is aiming to achieve in transforming public services. This work, responding to the Christie Commission's recommendations²⁰ seeks to reform public services through: a decisive shift towards **prevention**; greater integration at a local level driven by better **partnership**; **workforce** development; and a sharper, more

¹⁹ <http://www.legislation.gov.uk/asp/2015/6/contents/enacted>

²⁰ <http://www.gov.scot/resource/doc/352649/0118638.pdf>

transparent focus on **performance**. These link closely to the values and principles that underpin FSS's Strategy.

Our Values

9.1 The values against which we will measure everything we do are:

- **Public service** - having people at the heart of what we do, putting the consumer first;
- **Authority** – being a credible, consistent and trusted voice of authority on food matters in Scotland, basing our decisions upon sound science and evidence;
- **Openness** – being open and transparent in our dealings with the public, stakeholders and partners;
- **Independence** - at arm's length from Ministers, but aligned with the Government's Purpose; and
- **Partnership** – collaborating with others to achieve the best outcome for the public.

Our Principles

10.1 The principles that govern our actions are:

- a. *Public health and consumer protection in relation to food will be at the heart of FSS's Strategy. This puts people first, aiming to improve people's lives by preventing ill health related to food and diet.*
- b. *FSS engages consumers and stakeholders in determining and then delivering its strategic priorities and listens to what matters to consumers in relation to food. As a body charged with putting the consumer first, engaging with people is fundamental to what we do, and we have a good track record from FSA to build on.*
- c. *In working to deliver its strategic outcomes FSS takes decisions based on evidence. Again, an area where we can build on experience from previously being part of FSA. It will be important for FSS to recognise and articulate the relative strength of different pieces of evidence, and to be clear when there is uncertainty or conflicting evidence.*
- d. *FSS will seek to work collaboratively with other bodies in Scotland, the UK and beyond when this can realise greater consumer benefit than working alone. The partnerships that we develop with stakeholders and other bodies will be critical to how we deliver for people in Scotland. We will build on existing partnerships and identify new ones where these will help us deliver more.*
- e. *FSS values its independence alongside Government, whilst recognising its role in contributing to wider outcomes. FSS is part of the wider Scottish administration, and as a public body, will contribute to the wider National Purpose.*
- f. *FSS fulfils its role as Competent Authority (CA) in relation to EU food and feed law. We must ensure that food businesses meet their responsibilities in producing safe and authentic food, and ensure that our own performance and that of others such*

as local authorities makes us an effective regulator, prioritising consumer protection.

- g. *Food and feed businesses and other stakeholders that engage with FSS are treated fairly and with respect.* In carrying out all of our functions, our people will be well informed, skilled and professional in their approach.
- h. *FSS fulfils its regulatory obligations.* We will ensure that in carrying out our role as a regulator, that we apply the five principles of better regulation – to be transparent, proportionate, accountable, consistent and targeted - and that our activities are aligned with the wider objectives of the Scottish Regulators' Strategic Code of Practice, which sets out the performance expected of regulators to help make Scotland a better place to do business.
- i. *FSS's decisions and actions should support compliant businesses, and be effective at dealing with non-compliant ones.* This means that we will recognise and reward good performance, and act robustly to deal with poor performance.
- j. *FSS is clear that compliance is good for consumers and good for business - protection of public health is compatible with business and economic growth.* FSS will ensure that in protecting consumers by being an effective regulator, this will not stifle the growth or success of businesses that meet their responsibilities.

Delivering Our Strategy

- 11.1 We have set out in this strategy document the vision that we want to achieve - *to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers.* We have identified the strategic outcomes that we believe are key to us achieving this vision, and our values and principles in how we will work. Our draft Strategic Plan for 2016-19 sets out more detail of what we will do in that period to move us towards that vision, and how we will monitor our progress.

Table 1 – Mapping FSS Outcomes to Scottish Government’s National Outcomes

National Outcome	FSS Outcome	<i>Food is safe</i>	<i>Food is authentic</i>	<i>Consumers choose healthier diets</i>	<i>Responsible food businesses flourish</i>	<i>FSS is a trusted organisation and FSS is established, efficient and effective</i>
<i>We live longer, healthier lives</i>		✓		✓	✓	✓
<i>We have tackled the significant inequalities in Scottish society</i>		✓	✓	✓		✓
<i>Our children have the best start in life and are ready to succeed</i>		✓		✓		✓
<i>We realise our full economic potential with more and better employment opportunities for our people</i>		✓	✓	✓	✓	✓
<i>We live in a Scotland that is the most attractive place for doing business in Europe</i>		✓	✓	✓	✓	✓
<i>We reduce the local and global environmental impact of our consumption and production</i>					✓	✓
<i>Our public services are high quality, continually improving, efficient and responsive to local people’s needs.</i>		✓	✓		✓	✓