

# Food Standards Scotland

For safe food and healthy eating

**Strategic Issue Register:  
Q4 2024/25**



## Background



The Strategic Issue Register is designed to record and monitor issues impacting on the successful delivery of the FSS Strategy. The most important issues to FSS are those which will affect the delivery of the strategic objectives and key goals.

This approach aims to lay out a clear and direct line between the issues identified to strategy delivery and each of the goals and strategic objectives.

The FSS Strategic Issue Register exists to ensure that:

- Strategic issues are identified and managed.
  - Actions are determined, prioritised and action plans are implemented.
  - The effectiveness of existing actions are evaluated.
  - The Strategic Issue Register supports the FSS Strategic Plan.
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# Strategic Issue: Key

## STATUS KEY: Severity

<b>Very High</b>	Destructive and unacceptable impact on FSS/business operations that will result in a major change to overall approach. Large resource consequences.
<b>High</b>	Significant and unacceptable impact on FSS/business operations that will require material change to critical approach, procedure or process. Challenging resource implications.
<b>Medium</b>	Moderate impact on FSS/business operations that will require multiple changes in approach, procedure or process. Acceptable level of resource consequences
<b>Low</b>	Minor impact on FSS/business operations, will require little overall change in approach. Few resource consequences.

## STATUS KEY: Actions

<b>Completed</b>	
<b>On target</b>	On target for completion
<b>Ongoing</b>	Delayed/delay anticipated but no negative impact on successful issue resolution
<b>Ongoing</b>	Delayed/delay anticipated with negative impact on successful issue resolution

## STATUS KEY: Priority

<b>Very High</b>
<b>High</b>
<b>Medium</b>
<b>Low</b>
<b>Very Low</b>

# Strategic Issue Trends

## QUARTERLY ISSUE TRENDS

	2023-2024								2024-2025							
	Q1		Q2		Q3		Q4		Q1		Q2		Q3		Q4	
Issue	Priority	Severity														
1. FSS Budget Allocation	Very High ↔															
2. Local Authority Food Law Delivery Model			Very High ↔													
3. External Policy Pressures							High New	High New	High ↔	High ↔	High ↔	High ↔	Very High ↑	Very High ↑	Very High ↑	Very High ↑



## Strategic Issue No 1:

### FSS BUDGET ALLOCATION

FSS budget allocation is no longer adequate to meet all its outcomes as detailed in the 5 year strategy.

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# FSS Budget Allocation

<b>Issue No: 1</b>	<b>Executive Lead: G McEwan</b>	<b>Version: 2.0</b>	<b>Date issue raised: 24 August 22, by Geoff Ogle (FSS CEO)</b>  <b>Date issue reviewed: Apr-25      Current status: ongoing</b>
<b>Issue Title</b>		<b>Issue Description</b>	
<b>FSS BUDGET ALLOCATION</b> FSS budget allocation is no longer adequate to meet all its outcomes as detailed in the 5-year strategy.		<b>Escalation history:</b> FSS has been heavily impacted by leaving the EU and actual experience post-exit is bringing significant financial and staffing pressures on pre-existing and ongoing operational delivery. For financial year 2025/26 and 2026/27 FSS identified in its recently published financial management plan an emerging budget gap of £3.1m. This was communicated to Scottish Government, however the budget allocation has remained the same as the previous year at £22.7m. This budget allocation will not allow FSS to fulfil all of it’s statutory and legal obligations.	
<b>Strategic Objective(s)</b>		<b>Strategic Goals</b>	
<b>Insufficient revenue budget impacts upon FSS’s ability to delivery on all Strategic Objectives.</b>		<ol style="list-style-type: none"> <li>1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit.</li> <li>2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken.</li> <li>3. A research and data science capability which enables us to detect risks, monitor public health trends and consumer behaviours, and translate evidence into action.</li> <li>4. A food environment which empowers consumers to make safe, healthy, and sustainable choices.</li> </ol>	

# FSS Budget Allocation

ISSUE 1		Priority	Very High	Severity	Very High		
CONTROLS IN PLACE							
Quarter 4							
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner	
ALL	<p><b>Public Service Reform Programme: (PSR)</b> has commenced and FSS have made an initial submission providing opportunities for efficiencies, service improvements and significant income generation. This has yet to be actioned by SG.</p> <p>SAFER Issue provides more detail.</p>	30 50		2033	2026	G McEwan	
	Having been successful in co-funding specialist posts FSS are now exploring opportunities to support other smaller delivery bodies by providing shared services. This may realise some further income generation.	30 70		Mar-24	Oct-25 Sep-25	FSS Managers	
	FSS are in the process of drafting a new 5-year strategy which will be ambitious, realistic and supported by an integrated Finance, business and workforce planning methodology and process.	40 55		Q1 2026	Feb-26	G McEwan	
	FSS are involved both at a national and UK level in Corporate Benchmarking exercise. This will enable public bodies to review, compare and contrast corporate back-office functions with other similar sized organisations. Opportunities may arise for further collaboration initiatives.	50 100		Ongoing		G McEwan	
	FSS are meeting regularly with SG Head of Social Care and Integration Finance to discuss an increase in budget for financial year 2025-26. Recent work highlights that FSS now have an emerging budget gap of £2.5m. <b>This matter is subject to ongoing discussions and FSS are now in the position where SG Finance have recognised the £2.5m budget pressure and will review its status at ABR and SBR periods.</b>	50		Apr-25		G McEwan	
	FSS are in the process of preparing the 5 year strategy supplemented by a 5 year finance management plan and people plan. These documents will outline the costs and importantly the risks associated with an under funded organisation. The plans once finalised will be presented to SG Finance colleagues as a rationale for increased budget to deliver statutory functions from financial year 2026 onwards.	10		Oct-25		G McEwan	



## Strategic Issue No 2:

### **LOCAL AUTHORITY FOOD LAW DELIVERY MODEL**

Increasing resource pressures, including finance and staff, on Local Authorities and FSS has resulted in a delivery model which lacks the capacity, capability and competency needed to meet current and future challenges

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# Local Authority Food Law Delivery Model

<b>Issue No: 2</b>	<b>Executive Lead: I McWatt / L Murray</b>	<b>Version: 2.0</b>	<b>Date Issue raised: Oct-22</b>  <b>Date issue reviewed: Apr-25 Current status: ongoing</b>
<b>Issue Title</b>  <b>Local Authority Food Law Delivery Model</b>  Increasing pressures on Local Authorities and FSS result in a delivery model which lacks the resilience needed to meet future challenges.		<b>Issue Description</b>  <b>Escalation history:</b> The Public Sector collectively has failed to invest in the training and supply of professional resource, mainly due to funding cuts, therefore Local Authorities are unable to deliver food law requirements as prescribed in the Food Law Code of practice. The demand for professionally qualified staff within Local Authority Environmental Health and Public Analyst Services, therefore, far outstrips supply risking the ability to meet statutory food law intervention requirements.  <b>The recommendation of the Strategic Risk Management forum is that risk 6 has effectively materialised and should be managed as an ongoing issue.</b>	
<b>Strategic Objective(s)</b>  <b>Food is Safe and Authentic</b>  <b>Responsible Food Businesses are Enabled to Thrive</b>  <b>Consumers are empowered to make positive choices about food</b>  <b>FSS is Trusted and Influential</b>		<b>Strategic Goals</b>  1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit.  2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken  5. Be respected as an authority on food protection and public health nutrition, promoting change through impactful relationships within and beyond Scotland that enable us to influence, learn and collaborate.	

# Local Authority Food Law Delivery Model

<b>ISSUE 2</b>		<b>Priority</b>	<b>Very High</b>	<b>Severity</b>	<b>Very High</b>		
CONTROLS IN PLACE							
Quarter 4							
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner	
1,3,5	A programme of modernisation (known as SAFER) to address the continued deterioration of LA capacity and capability in delivering food law interventions is being designed. Execution of the Programme is dependent on additional resource being made available. Until such time as this is confirmed progress is limited to essential business as usual support for LAs.	5		2025/26	2027/28	L Murray	



## Strategic Issue No 3:

**EXTERNAL POLICY PRESSURES**

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# External Policy Pressures

<b>Issue No: 3</b>	<b>Executive Lead: Garry Mournian</b>	<b>Version: 1.0</b>	<b>Date issue raised: 12 February 2024</b> <b>Date issue reviewed: Apr-25</b> <b>Current status: Ongoing</b>
<b>Issue Title</b>	<b>Issue Description</b>		
<b>EXTERNAL POLICY PRESSURES</b>	<p>The legacy of the UK Government's post-EU Exit deregulatory statute book will continue to impact FSS. The policy and regulatory environment is now significantly more complex due to the interaction of the UK Internal Market Act, UK Common Frameworks, the Retained EU Law Act, and a potential future UK-EU SPS/Veterinary Agreement, outlined in the Labour party manifesto, may bring additional change. FSS's ability to remain fully engaged across UKG led policy initiatives within existing resource constraints will remain challenging, with consequent risks around GB/UK divergence, impact on delivery of core statutory obligations, and staff wellbeing, should work on specific areas for reform be ramped up by UKG.</p> <p><b>Escalation history:</b> The recommendation of the Strategic Risk Management Forum is that risk 8 should be managed as an ongoing issue.</p>		
<b>Strategic Outcome(s)</b>	<b>Strategic Goals</b>		
<b>Food is Safe and Authentic</b> <b>Responsible Food Businesses are Enabled to Thrive</b> <b>Consumers are empowered to make positive choices about food</b> <b>FSS is Trusted and Influential</b>	<ol style="list-style-type: none"><li>1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit.</li><li>2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken.</li><li>4. A food environment which empowers consumers to make safe, healthy, and sustainable choices.</li><li>5. Be respected as an authority on food protection and public health nutrition, promoting change through impactful relationships within and beyond Scotland that enable us to influence, learn and collaborate.</li><li>6. Engage with all parts of society in Scotland; understanding the issues that matter to consumers and providing information that is tailored to their needs.</li></ol>		

# External Policy Pressures

ISSUE 1		Priority	Very High	Severity	Very High			
CONTROLS IN PLACE								
Quarter 4								
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner		
ALL	Continue to make the case to Scottish Ministers that delivery of FSS's post-EU Exit policy and statutory responsibilities and ability to influence cross-UK policy making for the benefit of Scottish consumers and food businesses will be constrained within the current budget settlement.	20		Ongoing		G Ogle		
	Continue to remind policy leads in FSA, Defra, DHSC of UK common framework obligations as part of the policy development process and work across teams to publicise framework commitments once they move from provisional to final agreement. This includes leading on the development of joint operational FSA/FSS guidance on framework delivery, which will be prioritised again once the frameworks themselves have been formally signed off.	70		Ongoing	Dec-25	G Mournian		
	<del>Prioritise reform of the GB regulated products regime in line with FSS Board steer, seeking to progress priority reforms in 2024. In February 2025, the Scottish Parliament consented to the GB SI and this came into effect on 1 April, following UK parliament agreement. A further Board paper was discussed in December 2024 outlining plans for the next phase of potential reforms, with further consideration being given by officials in both FSS and FSA over the early part of 2025.</del> Phase 1 is now complete and moving on to phase 2. This will be updated at Q1 25/26 when we have further information.	80 100			Dec-24	Mar-25	G Mournian	
	Undertake an assessment on the impact of the UK Government's Genetic Technology (Precision Breeding) Act 2023, and EU New Genomic Techniques (NGT) proposals, and implications for Scotland, with a view to making recommendations to the FSS Board in 2025.	50			Apr-25	Dec-25	G Mournian	
	Prioritise collaborative working with Defra and SG on any proposed food labelling changes, including participation in a Defra led GB-wide consultation on animal welfare and country of origin labelling.	80			Ongoing	TBC	G Mournian	