

# Food Standards Scotland

For safe food and healthy eating

**Strategic Issue Register:  
Q2 2025/26**

**OFFICIAL SENSITIVE**



## 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.

# 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

	2024-2025								2025-2026							
	Q1		Q2		Q3		Q4		Q1		Q2		Q3		Q4	
	Priority	Severity	Priority	Severity	Priority	Severity										
1. FSS Budget Allocation	Very High ↔															
2. LA Food Law Delivery Model	Very High ↔															
3 External Policy Pressures	High ↔	High ↔	High ↔	High ↔	Very High ↑	Very High ↑	Very High ↔									
4. Cyber Security Breach												High New	High New			



## 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.

# 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: Nov-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 FSS identified in its recently published financial management plan an emerging budget gap of £2.5m. 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> <p style="text-align: center;">OFFICIAL SENSITIVE</p>	

# FSS Budget Allocation

ISSUE 1		Priority	Very High	Severity	Very High		
CONTROLS IN PLACE							
Quarter 2							
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner	
ALL	Scottish Government have recently published the new Public Service Reform Strategy which sets out the vision for all public services to go further and faster to deliver the services that people across Scotland need and deserve, and to improve lives. CSD are in the process of reviewing the strategy and preparing a high-level action plan for EMT to consider and progress.	10		2033	2028	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. <b>This opportunity has now stalled with SG not supporting the collaboration arrangement due to IT Oracle governance inhibitors. It is unlikely this will progress any further.</b>	<del>80</del> 10		Mar-24	Oct-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. <del>The draft strategy is now out for public consultation and will conclude on 14<sup>th</sup> September.</del> <b>The draft strategy has been out for public consultation with very positive feedback received. Good progress still being made with timelines continuing to be met</b>	<del>75</del> 85		Q1 2026	Feb-26	G McEwan	
	<del>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. FSS are now in the process of supplementing this work by preparing the Future Resourcing requirement for financial year 2026/27. This will be presented to Government Officials mid September 2025. FSS have submitted a revised budget requirement for fy 2026/27 to SG with a clear justification and rationale for the increase in funding. This is currently being considered by SG in line with other budget bids. It is likely FSS will be notified in January 2026. Dependant upon the outcome will determine next steps.</del>	<del>60</del> 100		Oct-25	Feb-26	G McEwan	



## Strategic Issue No 2:

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

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

# Local Authority Food Law Delivery Model

<b>Issue No: 2</b>	<b>Executive Lead: I McWatt / B Campbell</b>	<b>Version: 2.0</b>	<b>Date Issue raised: Oct-22</b>  <b>Date issue reviewed: Nov-25 Current status: ongoing</b>
<b>Issue Title</b>		<b>Issue Description</b>	
<p><b>Local Authority Food Law Delivery Model</b></p> <p>Increasing pressures, including on finance and resource, for Local Authorities and FSS has resulted in a delivery model which lacks the capacity, capability and competency needed to meet future challenges.</p>		<p><b>Escalation history:</b></p> <p>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.</p> <p><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></p>	
<b>Strategic Objective(s)</b>		<b>Strategic Goals</b>	
<p><b>Food is Safe and Authentic</b></p> <p><b>Responsible Food Businesses are Enabled to Thrive</b></p> <p><b>Consumers are empowered to make positive choices about food</b></p> <p><b>FSS is Trusted and Influential</b></p>		<p>1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit.</p> <p>2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken</p> <p>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.</p>	

# Local Authority Food Law Delivery Model

ISSUE 2		Priority	Very High	Severity	Very High		
CONTROLS IN PLACE							
Quarter 2							
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner	
1,3,5	<p>The continued deterioration of LA capacity and capability in delivering food law interventions has resulted in a programme of reform (known as SAFER) to review the existing delivery model for food law, including the scope for charging, third party assurance and use of digital and data. Funding for 2025/26 has been provided through the SG Invest to Save Fund (ISF) and success of the programme is incumbent on the future funding for 2026/27, 2027/28 and 2028/29.</p> <p>Local Authority Delivery Division is progressing several projects during 2025/26 to support Local Authorities in delivery of food law during the SAFER Programme. These include:</p> <ul style="list-style-type: none"> <li>● Project to review Qualifications and Competencies for Food Law Authorised Officers, incorporating alternate routes to qualification and a competency framework that allows tiers of authorisation across all business risk profiles. <b>A project plan is being developed to define this work.</b></li> <li>● Review of the Food Law rating System intervention frequencies using evidence from the FLRS review published in 2024. <b>The review proposal will be tabled at the October EMT meeting for agreement. If agreed engagement with LAs will commence with a view to having the amended system in place for April 2026.</b></li> <li>● Approved establishment Project intended to address issues raised during audit and to improve consistency of LA approach. <b>It will include review of existing protocols and Code of Practice for Approved establishments. A project plan is being developed to define this work.</b></li> <li>● Review of current 2019 Food Law Code of Practice to update and provide standard setting direction to Local Authorities. <b>The review proposal will be tabled at the October EMT meeting for agreement.</b></li> <li>● As part of business as usual continue with Local Authority resilience and support through quarterly discussions with Lead Food Officers to understand local pressures and performance.</li> </ul>	5 10		2025/26	2028/29	B Campbell L Murray	

# Local Authority Food Law Delivery Model

ISSUE 2		Priority	Very High	Severity	Very High		
CONTROLS IN PLACE							
Quarter 2							
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner	
1,3,5	<p>SAFER</p> <ul style="list-style-type: none"> <li>Inaugural programme board took place on 7th Oct 2025 with Governance arrangements, vision statement, objectives, ToR, organisational structure and hierarchy agreed.</li> <li>Development of the programme’s critical path, work stream and project priorities.</li> <li>Initiation of recruitment and transfer of key personnel from LADD to the SAFER programme.</li> <li>Development of a strategic communications and stakeholder engagement plan.</li> <li>Completion of the joint FSS and SG Digital CivTech proof-of-concept phase, developing a prototype to support proposals for a food business registration and charging system. The Programme Board will now consider advancing to phase 2, focusing on data and delivery options, using a co-design approach with industry and stakeholders.</li> <li>Establishment of key stakeholder codesign approaches, including initial engagement with Scotland Food and Drink on the establishment of an industry engagement subgroup that will focus on the codesign aspects of the programme.</li> <li>Development of a Voluntary Third-Party Assurance project plan, including a proof-of-concept phase focused on governance, frameworks, and standards. This will be followed by a small, targeted pilot phase to test and refine the approach.</li> </ul>	5 10		2025/26	2028/29	B Campbell L Murray	



## Strategic Issue No 3:

### EXTERNAL POLICY PRESSURES

# 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: Nov-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, and the Retained EU Law Act. The UK and EU have also committed to working towards a new Sanitary and Phytosanitary (SPS) Agreement based on dynamic alignment with EU rules,[redacted]. 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, particularly as work on a new UK-EU SPS Agreement increases.</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> <p style="text-align: center;">OFFICIAL SENSITIVE</p>	

# External Policy Pressures

ISSUE 1		Priority	Very High	Severity	Very High		
CONTROLS IN PLACE							
Quarter 2							
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. This is now being picked up through the budget discussions and calculations being led by Ian McWatt, which will not only factor in post EU Exit work, but the impact any negotiated SPS Agreement has across the breadth of FSS' remit.	40		Ongoing		I McWatt/G Ogle	
	Ensure appropriate FSS engagement and coordination with SG, relevant UKG departments, and the FSA as part of readiness preparations for formal UK-EU SPS negotiations [redacted].	25		TBC	TBC	G Mournian	
	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. Updated to AMBER as this work will be impacted by SPS – however it's likely frameworks will become the basis of GB discussion when feeding into EU matters.	70		Ongoing	ON HOLD	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 early 2026 2025. This is unlikely to progress as outlined in terms of Board discussions as PB is within scope of the SPS negotiations.	50		Ongoing	Apr-25	ON HOLD Mar-26	G Mournian

# External Policy Pressures

<b>ISSUE 1</b>		Priority	<b>Very High</b>	Severity	<b>Very High</b>		
CONTROLS IN PLACE							
Quarter 2							
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner	
<b>ALL</b>	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. The consultation has now closed and no proactive work is required. Labelling is also within scope of an SPS agreement and therefore it's unlikely and changes will be forthcoming during the negotiation phase (and beyond).	80		Ongoing	ON HOLD	G Mournian	
	A joint policy meeting with FSA every 6 months is being established. This will be a forward look across our priorities	N/A		Ongoing		G Mournian	



## Strategic Issue No: 4

### **CYBER SECURITY BREACH**

The focus on transformation in FSS corporate, data and digital strategies, positions FSS as a data driven and digitally enabled regulator but also increases the organisation's exposure to cyber threats. As such, we must ensure that we have appropriate cyber security protocols to provide us with greater confidence in navigating the potential cyber threats that we may face in the future.

# Cyber Security Breach

<b>Issue No: 4</b>	<b>Executive Lead: Garry McEwan / Tigan Daspan</b>	<b>Version: 1</b>	<b>Date issue raised: Aug 2025</b> <b>Date issue reviewed:</b> <b>Current status: Ongoing</b>
<b>Issue Title</b>	<b>Issue Description</b>		
<b>Cyber Security Breach</b> The focus on transformation in FSS corporate, data and digital strategies, positions FSS as a data driven and digitally enabled regulator but also increases the organisation's exposure to cyber threats. As such, we must ensure that we have appropriate cyber security protocols to provide us with greater confidence in navigating the potential cyber threats that we may face in the future.	<b>Escalation history:</b> In September 2024 ARC discussed the risks presented by a Cyber-attack across FSS, at which time they felt the risk was being properly managed and mitigated by FSS. As such the risk remained stable within the EMT level 2 risk register. It was agreed at SRMF on 13 August 2025 to re-table the Cyber Security risk to ARC where it was agreed as a strategic issue.		
<b>Strategic Outcome(s)</b>	<b>Strategic Goals</b>		
Cyber security impacts upon FSS's ability to deliver on all five strategic outcomes	<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><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>		

# Cyber Security Breach

<b>ISSUE 4</b>		<b>Priority</b>	<b>High</b>	<b>Severity</b>	<b>High</b>		
<b>CONTROLS IN PLACE</b>							
<b>Quarter 2</b>							
<b>Goal</b>	<b>Actions</b>	<b>% Complete</b>	<b>Status</b>	<b>Original Completion Date</b>	<b>Revised Completion Date</b>	<b>Action Owner</b>	
<b>All</b>	<b>Employee cybersecurity training and awareness raising</b> <ul style="list-style-type: none"> <li>Collaborate with FSS IG team to ensure the completion of annual SG data protection eLearning training by all FSS staff</li> <li>Recommend the completion of UK National Cyber Security Centre’s (NCSC) “stay safe online top tips” eLearning in 2025/26.</li> <li>Regularly communicate cybersecurity awareness campaign and update through CEO’s weekly update</li> </ul>	70%		Apr-26		T Daspan	
	<b>Enhance FSS cybersecurity posture</b> <ul style="list-style-type: none"> <li>Working with HEFESTIS to implement a comprehensive and structured cyber risk management program that implements the Office of the Chief Information Security Officer (CISO) program at FSS. The program will review and assess FSS cyber maturity and risk posture for 12 months – August 2025 to August 2026</li> <li>Monitor and report on number of email phishing attempts and provide appropriate training and staff awareness</li> <li>FSS annual Cyber Essentials reaccreditation with consideration to move to Cyber Essentials Plus</li> <li><b>Complete the Annual Public Sector Cyber Resilience Assessment (CRA) by 5<sup>th</sup> December 2025</b></li> <li><b>Register interest to pilot and subsequently use the new Scottish Government cyber security procurement tool – ‘Supply 25’ for supplier assurance evaluation and management.</b></li> </ul>	40%		Dec -26		T Daspan	
	<b>Protect sensitive data</b> <ul style="list-style-type: none"> <li>Monitor and report on FSS bespoke systems and applications to ensure FSS systems and data are protected</li> <li>Work with SG iTECS to ensure that all FSS digital assets have updated antivirus software and receive regular security patches</li> <li>Collaborate with system owners to conduct entitlement review of FSS bespoke systems</li> <li>Develop a data warehouse on FSS Azure cloud environment to host FSS key databases for enhanced data analysis/reporting dashboards</li> <li>Monitor and manage 3<sup>rd</sup> party penetration testing of key FSS bespoke systems.</li> </ul>	40%		Dec-26		T Daspan A Robins	
	<b>Strengthen incident response and recovery capabilities</b> <ul style="list-style-type: none"> <li>Review and enhance FSS incident response plan</li> <li>Participate in Scottish Cyber Coordination Centre (SC3) events and training programme to implement lessons learned in FSS and improve FSS Cybersecurity posture</li> <li>Implement lessons learned from FSS 2025 tabletop cybersecurity exercise.</li> </ul>	50%		Apr-26		T Daspan C Ikejiofor	