

Food Standards Scotland

Strategic Risk and Issue Register Report

1 Purpose of the paper

1.1 To provide the Audit and Risk Committee (ARC) with an update on the Quarter 4 2025/26 Strategic Risk and Issue Registers. This includes an overview of the revised risks and issues for 2026/27, and new proposed risks and issues.

1.2 The ARC is asked to **discuss and agree**:

- The closure of strategic **risk 7**.
- Strategic **risk 11** has materialised and monitor on the strategic issue register.
- The 2026/27 revision for strategic **risk 12**.
- The proposal of a new strategic risk '**Change Management**'.
- The proposal of a new strategic risk '**The Impact of the UK-EU SPS Agreement on FSS**' which will result in the proposed closure of strategic issue 3.
- The 2026/27 revision for strategic **issue 1**.
- The 2026/27 revision for strategic **issue 2**.
- The new strategic issue '**Shellfish and Wine Official Controls**'.

To note and review:

- The updated Q4 2025/26 Strategic Risk Register (**Annex A**) which explains the risks in more detail. All changes are marked in red.
- The updated Q4 2025/26 Strategic Issue Register (**Annex B**). All changes are marked in red.

2 Background

2.1 Risks and issues continue to be discussed at Divisional Level and Strategy Forum for proposed escalation with subsequent review at the Strategic Risk Management Forum (SRMF), before submission to the ARC. This is in line with the FSS Risk Management Policy and Guidance.

2.2 To align with new [FSS Strategy 2026-31](#), proposed strategic risks and issues, as well as current strategic risks and issues that have been revised for 2026/27 where required, are included in the Q4 strategic risk and issue registers for ARC agreement.

2.3 The revised and proposed strategic risks and issues are reflected on a new template that has been developed to ensure the strategic risks and issues are aligned with our strategic priorities set out in the new strategy. Progress has been made towards developing 'controls in place' and 'actions' for the risks and issues; these will be presented to ARC at the 2nd September 2026 meeting once the items have been fully articulated following Q1 2026/27 reporting.

3 Summary: Strategic Risk Register

3.1 The Strategic Risk Register was last reviewed by the ARC 10 March 2026, with the following noted:

- **Agreed** the proposed strategic risk 'Annual Report and Accounts'.

3.2 The SRMF met 06th May 2026 where senior managers, subject matter experts and risk owners discussed risks and issues across FSS. The SRMF agreed to propose one strategic risk revision, propose two new strategic risks and one strategic risk closure for ARC consideration.

4 Revised Strategic Risks for 2026/27

4.1 ARC to agree the revision to Strategic **risk 12** Maintaining an effective food surveillance capability. This risk has been revised to tie in with SPS and SAFER developments, and the on-going review of public analyst services.

5 Proposed strategic risks for consideration

5.1 A new strategic risk, Change Management, has been proposed for ARC agreement. This is in recognition of the high level of change the organisation is currently facing such as:

- Regulatory changes
- Political changes
- Appointment of new CEO
- Budget constraints

5.2 There is a risk that sustained organisational change, financial constraints and resultant change fatigue adversely affects organisational resilience, staff wellbeing, workforce capacity, and corporate capability therefore impacting on Food Standards Scotland's ability to deliver statutory obligations, strategic priorities and maintaining staff trust and public confidence.


5.3 A new strategic risk, The Impact of the UK-EU SPS Agreement on FSS has been proposed for ARC agreement. This risk materialising could impact the delivery of FSS statutory duties (both pre and post SPS coming into effect) alongside failure to achieve relevant aspects of the FSS SPS programme across negotiations, legislative work and implementation objectives. This could result in the outcomes of the SPS Agreement negatively impacting current and future delivery functions, our role as the food safety authority, and public health in Scotland. The agreement of this risk will result in the closure of strategic issue 3 – External Policy Pressures (para. 10).

6 Proposed Strategic Risk closure

6.1 The SRMF agreed to propose closure of strategic **risk 7** Changes to FSS role and remit.

6.2 Risk 7 (figure 1) ARC to note and agree the decrease in risk score from 75 to 20. The decrease in score is due to the risks relating to clarity of roles and responsibilities are being increasingly mitigated through agreement to explore a Memorandum of Understanding between FSS and the Scottish Food Commission.

Figure 1: Risk 7 Change to FSS's Role and Remit

Risk Description	Score / Trend
<p>Event: Changes to FSS strategy and work plan are needed based on Ministerial decision on our roles and responsibilities.</p> <p>Cause: FSS is directed by Ministers to deliver on new responsibilities or that we have responsibilities relieved from us. Presently potential changes could be on the horizon with the recent change in UK Government and as Scottish Ministers understand the implications from this.</p> <p>Effect: There may be an expectation that more be delivered by FSS to support implementation, for example, of the Good Food Nation (GFN) ACT. Any further decisions from a new UK Government are yet unknown.</p>	<div style="text-align: center;">  <p style="color: red; font-weight: bold; margin: 10px 0;">$2 \times 10 = 20$</p> <p style="margin: 10px 0;">(was $3 \times 25 = 75$)</p> </div>

7 Summary: Strategic Issue Register

7.1 Post discussion with issue owners, relevant subject matter experts and the SRMF, the issues have remained stable this reporting period. The SRMF agreed to propose two strategic issue revisions, two new proposed issues and one proposed issue closure for ARC consideration.

8 Revised Strategic Issues for 2026/27

8.1 ARC to agree the revision for strategic **issue 1** Budget Allocation. This issue has been revised to include resourcing challenges across FSS as well as the inability to continually improve and invest in science and evidence programme spend.

8.2 ARC to agree the revision for strategic **issue 2** Local Authority Food Law delivery Model. This issue has been revised to reflect the current situation and include SAFER related short, medium and long term actions.

9 Proposed Strategic issues for consideration

9.1 Public Service Reform, currently a strategic risk, has materialised and it is proposed that this is now monitored as a strategic issue. The Scottish Government has committed to a 10-year Public Service Reform Programme



and strategy. The immediacy of this means we must continue to deliver efficiencies and make more effective use of resources to deliver services in a fashion that reduces demand, cost and improves outcomes for communities. This provides opportunities to collaborate better as well as share services between similar delivery bodies.

9.2 A new strategic issue, Shellfish & Wine Official Controls has been proposed for ARC agreement. FSS is not fully meeting its statutory obligations in relation to shellfish sampling verification and wine inspections/regulatory work. The shellfish-related constraints are linked to health & safety limitations, and the wine constraints are due to limited available resource.

10 Proposed Strategic Issue Closure

10.1 Issue 3 (figure 2) ARC to note and agree that with the proposal of the proposal of ‘The Impact of the UK-EU SPS Agreement on FSS’ as a strategic risk, the SRMF agreed to propose closure of ‘External Policy Pressures’ as elements of SPS impacts and organisational priorities are reflected in the new risk.

Figure 2: Issue 2 External Policy Pressures

Issue description	Score	
	Priority	Severity
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, which is expected to have a significant impact on existing GB - wide food safety systems and regulatory processes. 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.	Very High	Very High
		

11 Conclusion

11.1 The ARC is asked to **discuss and agree:**

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- The 2026/27 revision for strategic **risk 12**.
- The proposal of a new strategic risk ‘**Change Management**’.

- The proposal of a new strategic risk '**The Impact of the UK-EU SPS Agreement on FSS**' which will result in the proposed closure of strategic issue 3.
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Annex A – Strategic Risk Register – see attached

Annex B – Strategic Issue Register – see attached