

Consultation: Food Standards Scotland Strategy (FSS) for 2021-2026

FSS are consulting on their [draft strategy](#) for 2021-2026. FDF Scotland has drafted a response to the key questions below. (To note Q1-4 are respondent name/contact details)

FDF Scotland draft response.

5. What are your views on whether this strategy will help to achieve FSS's vision for 'A safe, healthy and sustainable food environment that benefits and protects the health and well-being of everyone in Scotland' (Section 1)

Agree

Comments

Whilst we fully support the intended outcomes we note that "Safe, Healthy and Sustainable" are broad terms open to interpretation.

FDF Scotland agree that the strategy will help to achieve the above mission. We particularly welcome FSS listing the food industry as a key partner in delivering this vision. Members involved in the primary production of food stated they would have like to have seen a greater focus on the agri-food sector.

Mission Statement and Strategic Outcomes

6. Do you agree or disagree that FSS's mission statement reflects what will be needed from us as an effective food body between 2021-26; acting in the best interests of the people of Scotland? (Section 2)

Agree

Comments

See our response to Q7.

7. Do you agree or disagree that the 5 strategic outcomes FSS aims to achieve through this strategy will be sufficient to protect the food interests of consumers in Scotland between 2021-26? (Section 2)

Agree

Comments on the 5 outcomes and whether any additional outcomes should be included

The outcomes focus on protecting consumers' interests but also rightly reflect the role that food and drink manufacturers can play in contributing to the development and delivery of FSS priorities for the benefit of shoppers in Scotland and beyond.

Food safety and authenticity are of paramount importance to food and drink manufacturers. FDF Scotland members work hard to deliver safe, authentic great tasting food and drink of the highest quality and we are proud of having some of the highest food standards in the world.

Our industry values working in partnership with FSS to ensure that consumers have full confidence in the food supply chain. We also work proactively to support food and drink

businesses in this respect, as reflected, for example, in our Food Authenticity Guide and our member intelligence sharing service.

Understanding risk should be included. For example, risks associated with the steady withdrawal of crop protection products, e.g. glyphosate and the impact thereof.

8. Do you agree or disagree that the values and guiding principles outlined in the strategy fully reflect what will be required from us to fulfil our consumer protection and regulatory functions between 2021-26? (Section 3)

Agree

Comments

In relation to evidence gathering and research, we note the synergies between the Scottish Government's recent consultation with The Environment, Natural Resources and Agriculture Research Programme¹ and the evidence gathering that is proposed within the FSS strategy. FDF Scotland responded to the afore-mentioned strategy citing the need for the research programme to work with FSS on the following areas

- **B4. Food supply and security:** The purpose of this research topic is to equip policy makers with the knowledge to ensure that domestic food production in Scotland can fulfil the goals of providing good, high-value jobs domestically, and contribute to a healthy Scottish diet and the circular economy
- **B6. Diet & Food Safety:** This topic will support Scottish Government's commitment to the concept of Scotland as a 'Good Food Nation', where our population takes pride and pleasure in, and benefits from, the food they produce, buy, cook, serve, and eat each day. The importance of a safe, healthy, nutritious and environmentally sustainable food and drink environment in Scotland is a critical part of our culture and is fundamental to our economic growth and public health. It is vital that actions support achievement of the Scottish Dietary Goals and maintain a focus on reducing health inequalities in the population.

Data and Evidence

9. Do you agree or disagree with our proposals for using data and evidence to address key priorities highlighted in the strategy? What are your views on how FSS can optimise the use and sharing of data and evidence to deliver this strategy? (Section 4)

In addition to our response to question 8, in this time of unprecedented and rapid change, there is an opportunity for FSS to take a different approach to the science and evidence around changing consumer behaviour relating to diet. FDF suggest gathering evidence that leads to developing nutrition policy focused on improving the nutrient density of the foods and diets people eat and encouraging positive food messages should be a priority. Food industry could be partners in helping to amplify positive messages

We would suggest that FSS expands the sources of evidence and data gathering beyond retail purchase data to better understand why people buy what they buy, when & how do they prepare, eat and consume food and drink and how much is wasted. For example, data from the Scottish Government states that approximately 600,000 tonnes of food is wasted in Scottish households each year². Avoidable food waste represents around 12% of all food

¹ <https://www.gov.scot/publications/draft-strategy-environment-natural-resources-agriculture-research-consultation/>

² <https://www.gov.scot/publications/food-waste-reduction-action-plan/>

purchased³. Through gaining a better understanding, it is more likely positive food messages can be appropriately tailored and impactful.

We also need to ensure that decisions and policy are driven by evidence rather than finding evidence to support policy. We would be very supportive of identifying dietary choice strategies or food compositional changes that are proven to deliver health outcomes.

Flexibility and Sustainability

10. Do you agree or disagree that this strategy will enable FSS to be sufficiently flexible to adapt to the impacts of EU Exit and COVID-19 on the food chain in Scotland? (Section 5)

Yes, I agree in part

Comments

It is vital that as we leave the EU that FSA, FSS and the Local Authorities are adequately resourced and funded to be able to protect Scotland's food businesses and consumers. FSS has been a vital partner in Scotland's food and drink supply chain. However, it is reliant on risk assessments by FSA that plans to take on the role of EFSA. This is a huge task and we have seen no clear glidepath to how FSA will achieve its required assessments and thereby FSS to perform its functions. There needs to be a clearer programme of deliverables over the term of this FSS strategy.

11. Do you agree or disagree that this strategy adequately reflects wider consumer interests with regard to issues relating to sustainability? (Section 5)

Yes, agree in full

Comments

We welcome this has been included and understand that this is not within the FSS remit however, the changing public demands as a result of this will have an impact on the nations diet. FDF Scotland is keen to work with FSS and others to better understand how this affects Scotland's shopping and dietary habits.

What is or isn't sustainable is often down to specific details or complex interactions, which is not always understood by the wider consumer base. FDF Scotland is committed to looking at how we can support our members to improve their sustainability together with the government and other stakeholders. However, it is extremely important that any direction of change is evidence-based and proven beneficial for our people and planet.

12. What are your views on the priorities for FSS's new strategy with regard to reducing health inequalities in Scotland? (Sections 3 and 5)

Comments

Other organisations are better placed to respond to this.

Delivery of FSS Strategy

13. Do you agree or disagree that the strategy fully reflects the partnerships that FSS will rely on to be able to deliver this strategy effectively? What partnerships will be particularly important in achieving FSS's Vision, Outcomes and Goals? (Section 6)

Yes, I agree that it fully reflects the partnerships

³

<https://www.zerowastescotland.org.uk/sites/default/files/How%20much%20food%20waste%20is%20there%20in%20Scotland%20Final%20v2.pdf>

FDF welcomes the inclusion of the partnerships section – it reflects the growing partnership working both within Scotland and beyond. It is particularly welcome that the food and feed industries are recognised as partners by FSS. It is also important for FSS to have close links with APHA as a significant proportion of Scotland’s food comes from plants and animal products farmed in Scotland.

14. Your views are invited on the key risks and challenges faced by FSS in delivering this strategy and how these should be addressed. (Section 7)

Comments on key risks and challenges

Whilst we appreciate there will be some challenges around e-commerce for FSS, the food industry sees e-commerce and emerging technology as a huge opportunity in Scotland to grow our market for Scottish food and drink at home and abroad. Technology also provides a myriad of potential solutions to help food and drink businesses make their products healthier and to help shoppers to make healthier choices.

15. Do you agree or disagree that the six goals and activities identified in the strategy reflect Scotland’s priorities for public health and consumer protection relating to food over the next 5 years? (Section 8)

Agree

Comments

FDF Scotland is broadly supportive of the goals. Goal 1 is particularly critical to the success of Scottish food businesses beyond EU exit.

Goal 3 – we refer to our response to question 9 about looking to expand sources of evidence.

16. Do you have any additional comments you wish to include about the FSS Strategy 2021-26?

Our members found the infographic on page 10 confusing :



FDF and our members have always been opposed the approach of demonising foods and food categories in this way as it ignores the essential principles of nutrition which is about ensuring an individual can obtain their individual nutritional requirements from the foods they eat.

Specifically, the infographic appears to suggest that e.g. high saturated fat butter (80% fat) and cream (35-55% fat) is “good whilst whole milk (4% fat, plus protein) is “bad”. Any food can be over-indulged leading to nutrient imbalance, but to demonise entire categories is likely to be counter-productive. We would suggest this infographic is removed.

The Food and Drink Manufacturing Industry

Food and Drink Federation (FDF) Scotland represents the food and drink producers in Scotland. We are Scotland's largest manufacturing sector, accounting for 31 per cent of total manufacturing turnover⁴. Our gross value added to the economy is £3.9 billion, representing 32 per cent of Scottish manufacturing value added⁵. We have 1,385 food and drink manufacturing businesses, employing 47,000 people, which represents 26 per cent of the Scottish manufacturing workforce⁶. In 2018, manufactured food and drink exports from Scotland increased by 8 per cent to £7.0billion⁷.

The Food and Drink Federation (FDF) is the voice of the UK food and drink manufacturing industry, the largest manufacturing sector in the country. Our industry has a turnover of more than £105billion, which is almost 20 per cent of total UK manufacturing, and Gross Value Added (GVA) of more than £28billion. Food and drink manufacturers directly employ over 430,000 people across every region and nation of the UK. Exports of food and drink make an increasingly important contribution to the economy, exceeding £23billion in 2019, and going to over 220 countries worldwide. The UK's 7,400 food and drink manufacturers sit at the heart of a food and drink supply chain which is worth more than £120billion to the economy and employs 4.3 million people.

The following Associations actively work with the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
BCA	British Coffee Association
BCUK	Breakfast Cereals UK
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CBA	Craft Bakers Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FNA	Fruit and Nut Association
FOB	Federation of Bakers
GFIA	Gluten Free Industry Association
PPA	Potato Processors Association

⁴ Source: Scottish Annual Business Statistics.

⁵ Source: Scottish Annual Business Statistics.

⁶ Source: Scottish Annual Business Statistics.

⁷ Source: Exports Statistics Scotland. Figures include tobacco manufacturing.

SA	Salt Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SSA	Seasoning and Spice Association
UKAPY	UK Association of Producers of Yeast
UKTIA	United Kingdom Tea & Infusions Association Ltd

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)
Frozen Food Group
Ice Cream Committee
Meat Group
Organic Group
Seafood Industry Alliance