Food (Scotland) Bill

British Medical Association Scotland

The BMA in Scotland welcomes the opportunity to provide evidence to the Health and Sport Committee at stage 1 of the Food (Scotland) Bill. The BMA supports the dual role of Food Safety and Food Standards to be delivered by the new body created in this Bill - Food Standards Scotland (FSS). We welcome the objectives of Food Standard Scotland laid out in the Bill and the wide scope of the organisation’s objectives and functions which will allow the FSS to be flexible in its involvement in a broad range of policies.

The BMA welcomes the intention for the FSS to be independent of Government and the food industry. The BMA firmly believes that commercial industry should not have a role in the development of public health policy. There is a fundamental conflict of interest when industry is focused on making a profit and health professionals are attempting to improve public health.

During the Scottish Government’s consultation on creating a new food body the BMA raised some issues of concern in regards to food safety and the development and implementation of policy on food standards. Some of these are not directly addressed in the bill due to the wide nature of the objectives and functions but the BMA hopes that these issues are still considered as the Bill progresses and particularly when formulating any guidance for the FSS.

Food Safety
Recent public health risks have emphasised the importance of having rigorous safety standards that food producers and retailers must adhere to as well as effective inspection processes. However as many producers operate outside of Scotland it will be important that the new Scottish body works closely with the bodies responsible for food safety and standards in the rest of the UK and EU. The BMA supports the comments in the explanatory notes that FSS will not be limited to work only with public bodies and office-holders in Scotland but will include the rest of the UK and the Europe.

Food Standards – Policy development and implementation
While efforts have been made to try to develop policies and frameworks to address the growing obesity problem in Scotland, these have been piecemeal and disappointingly ineffective. The BMA believes that the role of the FSS should include co-ordinating activity and provide leadership to deliver an effective health and nutrition policy.

While the BMA is not looking for the following points to be included on the face of the Bill we hope that when setting out the priorities of the FSS these issues are discussed and included within their remit for the development and implementation of policy:

Labelling: The BMA is disappointed at the lack of progress on traffic light food labelling and would welcome more concerted action on this issue by new body.

Research: The BMA believes that the new body should champion evidence based practice and policies and undertake, fund and promote research in Scotland. Research should be focused on interventions and policies that will have the greatest impact on reducing the burden in Scotland.

Education: Health Scotland provides much of the public engagement/education programmes on healthy matters in Scotland. The BMA recognises that the new statutory objective on diet will allow for further
development of the relationship between the new FSS and Health Scotland working together on issues such as diet and nutrition and welcomes the aim to allow that relationship to remain flexible.

The BMA believes that there is a growing need to consider the ‘obesogenic’ environment which greatly influences the choices people make.

For example, as well as ensuring that the legally required standards for school meals is met, the body should have a role in extending food standards to other public sector organisations e.g. hospitals and care homes.

The body should also consider how to limit the influence of the junk food industry and develop opportunities for the healthy choice to be the easy choice. For example, banning junk food advertising before the watershed and limiting the advertising and provision of ‘unhealthy’ products in the health environment e.g. in hospitals, or at sporting events such as the 2014 Commonwealth Games.

In summary the BMA supports the general principles of the Food (Scotland) Bill but believes that for the new body to be effective in tackling Scotland’s problems with food safety and standards it needs to provide strong leadership, champion evidence based practices and policies and work to develop opportunities for the healthy choice to be the easy choice.

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