

**Scottish Food Advisory Committee  
6 March 2008  
Barcelo Edinburgh Carlton Hotel  
Edinburgh**

**Open Session**

Present

Committee Members:

Prof.Grame Millar - Chair

Bill Reilly

Charlotte Maltin

David Cameron

Catherine Brady

Moyra Burns

Amanda O'Donoghue

John Cowden

Brian Ratcliffe

Catherine Benton

FSAS Officials:

Lydia Wilkie, Assistant Director, FSAS

George Paterson, Director FSAS

Jane Ferries, Committee Secretary, FSAS

Melanie Martin, Committee Administrator, FSAS

Christine Green, Policy Officer, FSAS

Samantha McKeown, Policy Officer, FSAS

Bill Adamson, Head of Strategic Policy and Consumer Engagement Branch, FSAS

**1 CHAIRMAN'S INTRODUCTION AND WELCOME**

1. The Chair welcomed members, guests and observers to the open meeting of the Scottish Food Advisory Committee (SFAC). The Committee was pleased to be in Edinburgh.
2. The role of SFAC is to provide advice to the Food Standards Agency (FSA) on all food safety and standards matters, which have a specific Scottish perspective. The Agency in turn has to fully consider the Committees views when determining its actions and the policy advice it gives to Ministers. Most food issues are devolved to Scottish Ministers and changes are implemented by the Scottish Parliament. This Committee is an essential element to the Agency to ensure that devolution is fully taken into account. The Committee holds regular meetings throughout Scotland.
3. Members of the Committee were invited to declare any conflicts of interest on specific areas before they are discussed to allow a decision to be taken on whether participation would be correct.
4. The Chair asked for items of AOB. No items were raised.
5. The Chair welcomed two new members of SFAC who began their terms on 1<sup>st</sup> Mach 2008 –Dr Carrie Ruxton & Mr Christopher Trotter.

6. There were apologies from Jim Arbuckle (SFAC member) and Jim Thomson (Assistant Director FSAS)

**ITEM 2**

**MINUTES AND MATTERS ARISING FROM THE PREVIOUS MEETING**

7. The Chair directed the Committee to the minutes from the previous meeting 6 February 2008 in Aberdeen.
8. The Chair asked for an update on the progress of the FSAS Group Plan 2008-2011.
9. The Agency informed members and observers it was hoped that the Group plan was in the final stages and would be published by the end of March 2008 and would be issued to SFAC on completion
10. Members agreed that the minute was a true and accurate record of the meeting held on 6 February 2008.
11. The Chair informed members that the note of the Food Hygiene Information discussion would be issued to the FSA Board as they were discussing FHIS and 'Scores on the Doors' at their Open meeting in Edinburgh on 12<sup>th</sup> March 2008.

**ACTION: Secretariat to issue a note of the FHIS discussion to FSA Board Secretariat.**

**ITEM 3**

**SFAC Scottish Consumer Council (SCC) working Group report and recommendations on 'Young People and Food Safety – 5 years on'**

12. The Chair introduced the item giving the background of the sub group. He asked David Cameron to present the paper and recommendations for Committee members to agree and formally submit to FSAS.
13. David Cameron thanked SCC who met with them on 26<sup>th</sup> February, for the support and assistance with their report. He asked members to consider the recommendation and asked for agreement on these.
14. The recommendations were as follows: -
  1. **SFAC indicate to FSA that messages and advice given on food safety need to be consistent and soundly based.**
  2. **SFAC advise FSA that the use of the term 'piping hot' is not fit for purpose as nobody appears to be able to give a satisfactory definition for the term. SFAC recommends that this area is reviewed and measures taken to clarify. For example a term such as 'boiling hot' should be considered.**
  3. **SFAC recommends that FSA undertakes to review guidance for storage of shell eggs taking into consideration the differences**

between kitchen and retail situations, and where necessary issue new advice.

4. **SFAC recommends that FSA undertakes to review guidance for re-heating of food taking into consideration the differences between domestic, commercial and retail situations and where necessary issue new advice.**
5. **SFAC advise FSA that the Agency in its role as the ‘guardian’ of food safety should continue to ensure that the enforcement officers on the ground be trained and encouraged to provide accurate and consistent advice to food business operators and/or the public.**
15. Members agreed with the recommendations put forward from the sub group and asked for the report to reflect SFAC’s support of the Agency’s work with Curriculum for Excellence and helping teachers in ensuring food safety messages continue throughout school. They also commended the Agency on the resource documents provided throughout the various meetings of the sub group.
16. Members asked for an update on the recommendations within the sub group report to come back to the Committee in 6 – 12 months.
17. **Mary Lawton – Scottish Consumer Council**

Ms Lawton informed members the SCC have been speaking to the Curriculum for Excellence and they were aware of the report.

**ACTION: FSAS to give an update on progress of the recommendations from the sub group in 6 – 12 months.**

**ACTION: Secretariat to formally submit the sub group recommendations to FSAS.**

**ITEM 4  
EU LABELLING CONSULTATION ‘COMMISSION PROPOSAL FOR A  
REGULATION ON THE PROVISION OF FOOD INFORMATION TO  
CONSUMERS’**

18. The Chair welcomed Christine Green, Policy Officer, Food Standards Diet & Nutrition, FSAS to the table who gave a presentation on the above mentioned consultation covering:-
  - Content of Proposal
  - Simplification
  - Principles Based Approach
  - Nutrition Declaration
  - Voluntary Nutrition Labelling
  - Labelling Clarity – Presentation of Information
  - Country of Origin
  - Food Sold Non Prepacked
  - Distance Selling

- Labelling of Alcoholic Beverages
19. Members of the EU Labelling sub group thanked FSAS and Theresa Ekong, FSA HQ for their assistance and papers produced on this area to assist with their response. They recognised this was a very complex subject and it would return to the Committee in April (after a further meeting) with a suggested response to the consultation.
20. The Chair asked members to raise questions or areas where they required clarity with regard to the consultation. The following issues were raised: -
- Members asked for clarity on non-pre packed foods.
  - Members asked if the regulations proposed replace the regulations currently in place.
  - Members raised concerns with the proposed regulations with regard to advertising and presentation.
  - Members asked for the difference between origin and provenance.
  - Members asked for clarification on the term 'appropriate use of food' under Article 26 – Instructions for use.
  - Members raised concerns around the proposed size, type and width of font for labelling. They felt it was important this was clarified as it could cause issues for manufacturers.
  - Members asked for a definition of 'salatrim's'
  - Members asked if the adult reference nutrient intake was based on men or women.
  - Members asked if there was a provision to place units of alcohol on products labelling.
  - Members asked which spirits (e.g. liquors) were included in the regulation.
21. The Agency response was as follows: -
- Non pre packed foods are food sold loose and pre packed for direct sale. Take away foods were classed as a loose food and therefore were non-prepacked. Pre packed for direct sale is where a product is packed and sold on the premises or sold by a business under its control. Confusion arises where sandwiches can be pre packed or pre packed for direct sale. They were pushing for the pre packed for direct sale to be included as a definition in the regulation as there was a large amount of consumer confusion around pre packed for direct sale foods.

- The proposed regulations would replace 8 directives and the 1996 general food labelling regulations would be revoked.
  - The proposed regulations covered advertising and presentation of food.
  - Country of origin is defined in the custom code and is currently defined as the member state and place of provenance could be a region within that member state.
  - The Agency informed members they would return with the definition under Article 26.
  - The Agency was aware the font/print size was not clearly defined.
  - A definition of 'salatrim's' would be given to members at a later date.
  - The adult reference nutrient intake was based on a woman's intake in the proposed regulation.
  - Alcohol provisions would be covered at a later date under another regulation.
  - The Agency would investigate which spirits were covered under the proposed regulation.
22. Members raised concerns with no clear definition of a portion within the document as it made the recommendations difficult to understand. A clear definition of a portion was needed. A clearer definition of weight as sold was also required however it was recognised this was derived from another directive. They added that manufacturers also needed to define their meaning of portion size.
23. Members suggested that child nutrient declarations could be used on foods specifically marketed for children. They also raised concerns with the adult reference used being based on a woman and the lack of understanding with consumers and Guideline Daily Amounts (GDAs) The recommendation of size of labelling was also an issue. With regard to distance selling members raised concerns highlighting that it may be difficult for business to meet the proposed regulations.
24. The Agency stated that under the proposal there was no requirement for a use by /best before date to be given prior to purchase. However this would be mandatory at moment of delivery.
25. **Patrick Krause – Scottish Crofting Foundation**  
Mr Krouse asked for clarification on the voluntary scheme of country of origin labelling.

26. The Agency informed members and observers that certain subject areas such as beef and honey had a mandatory requirement for country of origin to be given however under general food labelling there is only a requirement to provide country of origin or provenance if the label would otherwise be misleading to consumers (i.e. a flag on a product) They added that country of origin was defined at member state level.
27. **Gordon Steel – Scottish Whisky Research Institute**  
Mr Steel asked if distilled drinks (other than whisky) where ingredients were imported could carry a label as distilled in the UK.
28. The Agency stated the guidelines at present state the place where the product last underwent substantial change would be the country of origin however under the draft proposal voluntary guidelines would be tightened to also require origin of primary ingredients to be given if different to place where the finished product comes from.
29. **Nick Paul –Scottish Association of Farmers Markets**  
Mr Paul raised concern over the percentage of alcohol in wine used to define a unit of alcohol on labelling (currently 9%) and hoped the labelling requirements on alcohol would take this into account.
30. **Robbie Beattie - Edinburgh Scientific Services**  
Mr Beattie asked if language on labelling was included in the new proposal.
31. The Agency stated the proposal sets out requirements on use of languages allowing for the use of more than one language. However one must be in the language of the member state.
32. The Chair thanked Christine and Sam McKeown for their contributions to the discussion and added that the draft response from the Sub Group would be discussed under A.O.C.B. at the meeting in April.

**ACTION: SFAC EU Labelling Sub Group to hold a further meeting before April meeting.**

**ACTION: SFAC EU Labelling Sub Group to prepare a draft response to the consultation to bring to the Open April meeting**

**ACTION: FSAS to provide clarification on ‘appropriate use of food’ in Article 26.**

**ACTION: FSAS to provide members with the definitions for ‘salatrim’s’**

**ACTION: FSAS to provide SFAC with a list of which spirits are included under the proposed regulations.**

**ITEM 5**

**Scottish Government discussion document 'Choosing the Right Ingredients – The Future of Food in Scotland'**

33. The Chair gave the background to the discussion document and introduced Bill Adamson, FSAS to the table.
34. Bill Adamson explained that currently the Scottish Government discussion document did not, in itself, pose any specific questions to consultees. The intention was to generate debate and to seek agreement on the proposed direction of travel for the future for food in Scotland. He added that during the SFAC Stakeholder forum there were some issues raised by attendees which understandably were outwith the Agency's remit. The purpose of the paper produced for members was to facilitate a discussion and highlight the major issues which were pertinent to the Agency's policy remit including:

- Tracing food to its origin linked to identifying and promoting Scottish produce.
- Encouraging reformulation of manufactured foods to make them lower in fat, salt and sugar.
- Teaching young people about food and cooking.
- Encouraging consumers to make healthy choices.

He added that the paper highlighted the role Scottish Government envisaged government bodies (including FSA) having in taking initiatives forward. This included:-

- Helping vulnerable people to access affordable healthy food.
- Advising people about safe food.
- Supporting business to where necessary reformulate products.
- Encouraging & supporting people to make healthier choices.

35. The Chair opened the debate to members asking them the following questions:

***Does the Committee agree that the areas of proposed future government involvement highlighted are comprehensive enough?***

36. Members made the following comments:-

- There was general support for the paper and direction of travel. Members agreed the major points raised were comprehensive and it would be difficult to have issue with any suggestions within the discussion document. However they recognised the suggestions were far from being refined policy. The biggest challenge would be in ensuring subsequent policies were sustainable and meaningful to all stakeholders.
- Members raised the experience of the Scottish Diet Action Plan and issues with achieving targets within this document. They felt it would be important that on this occasion outcomes were fully delivered.
- Members suggested the Scottish Government look into ensuring a level playing field for Scottish producers, manufacturers and retailers. Particular emphasis was placed on retailers and encouragement was needed for greater diversity of food and beverage retailers so there is greater diversity of Scottish produce available to buy.
- Members recognised the document was heavily based on diet & nutrition. They asked that the food safety element was not lost within discussions. Microbiological safety of food was still an important issue, both in relation to public health and market stability through high levels of consumer confidence.

***Are there any other areas the Committee think the Agency should be involved in?***

- Members were in favour of promoting Scottish foods however they questioned if this objective was within their remit (i.e. pushing commercial elements forward) while recognising the related traceability issue would be.
- Members recognised there were good nutritional reasons for the promotion of certain Scottish producers/manufacturers within Scotland.
- Members recognised the importance of education in all elements of food production, manufacture and consumption.

***Where does the Committee consider should be priority for Agency Involvement?***

- Members recognised there was a need to ensure all elements, including working with consumers, industry and looking at science, would be necessary and form the basis of a strong policy.

- Members highlighted the need for education and the need to look at behavioural science to assist in changing consumer attitudes towards food.
- Members again highlighted the importance of food safety.
- Members recognised the Agency was already involved in many areas of work suggested within the discussion document. They emphasised the Agency should continue to be involved in setting standards in relation to matters of nutrition and food quality.
- Members felt there might be an increased role for the Agency in supporting community food and health projects in deprived and rural areas.
- Members asked the Agency to recognise the lack of skills and shortage of knowledge with the technical workforce. In particular regarding matters of food reformulation.

***Does the Committee have specific advice to give the Agency on?***

- ***Country of Origin labelling to assist identification of 'Scottish Produce'?***
  - Members asked if it would be possible to label a product 'Scottish' if the majority weight of its composition was from Scotland.
  - Members stated it would be important the Agency worked with industry to ensure clarity with regard to labelling products from Scotland.
  - Members raised concerns there could be exclusivity of Scottish products over UK products.
- ***How the Food Policy might assist Scottish industry to improve the diet of the Scottish population?***
  - Members encouraged the Agency to continue their work with regard to reformulation. Continuing to work closely with Scottish manufacturers.
  - Members recognised the purchasing power within public procurement to encourage the use of Scottish produce.
  - Some members expressed a desire that the food policy debate would interconnect with other existing policies such as obesity

37. Agency officials advised members they should not feel constrained to a specific remit, and welcomed all comments. They added they would ensure areas out-with their remit would be passed onto the appropriate authorities. They recognised the importance of food safety in maintaining consumer confidence and market stability and agreed this could be more prominent in the conversation. With regard to reformulation and sign posting the Agency stated they were continuing to work alongside industry and those keen to promote Scottish produce.
38. A member asked if there were regulations with regard to the length of time oil could be used as they suggested this might have an affect on the amount of oil absorbed by foods.
39. The Agency informed members this information would be looked into and provided at a later date.
40. A member mentioned an initiative being piloted in the Outer Hebrides where local producers provide food to schools for a two week period. They felt this could provide best practice if successful.
41. The Chair opened the debate to observers.

42. **Nick Paul – Scottish Association of Farmers Markets**

Mr Paul raised concerns with the lack of abattoirs in Scotland. He added the loss of value of Scottish produce being slaughtered outwith the country. He also informed members of the Eat Scotland campaign that encourages Bed & breakfasts to buy fresh local produce and recognised.

43. **Catherine Brady declared an interest as director of Eat Scotland** and added that the scheme at present did not cover the provenance of food but did look at the quality and service of food.

44. **Robbie Beattie - Edinburgh Scientific Services**

Mr Beattie highlighted the constraints within Local Authorities and the lack of continual funding and workforce within the area of food safety. He referred to the FSA Guidance on the definition of organic food and asked if this could be linked to gain a similar definition on quantity and provenance of products.

45. **Patrick Krause – Scottish Crofting Foundation**

With regard to country of origin labelling Mr Krause raised concerns with small producers and the definition of local. He asked for clarity on this definition during the food policy conversation.

46. The Chair thanked Bill Adamson for his contributions to the discussion and looked forward to future discussions and involvement within the policy conversation process.

**ITEM 6  
AOCB/PUBLIC SESSION**

47. Jim Arbuckle and Catherine Brady have come to the end of their terms of appointment. The Chair thanked them for their work and contribution over the past 2 and five years respectively.
48. The Chair informed members and observers the Scottish Government consultation 'Glasgow 2014 – Delivering a Lasting Legacy for Scotland would be discussed at the next Open SFAC meeting on 16<sup>th</sup> April in Glasgow.
49. The FSA Board meeting will take place in Edinburgh on the 12<sup>th</sup> March 2008.
50. The Chair asked observers for questions they may have for the Committee or Agency.
51. **Sandy MacGregor – Member of Public**  
  
Mr MacGregor supported the Agency and Committee views to promote Scottish produce however he felt that there was a bigger push and promotion of organic food than for local produce. He felt this was an issue, which should be looked at.
52. The Agency informed members and observers of the FSA policy on Organic foods and stated they see organic as consumer choice and were unaware of scientific evidence to support higher nutrient content in these foods at present.
53. **Christopher Trotter declared an interest as a member of the Soil Association** and added that organic produce imported from abroad was a concern.
54. **Nick Paul – Scottish Association of Farmers Markets**  
Mr Paul agreed an organic food was a consumer choice. He raised issues with the definition of local.
55. The Chair thanked observers and members for their contributions to the discussion.
56. The meeting closed at 12:25.