

Food Standards Agency Strategy for 2010 to 2015

Stakeholder Event, Belfast, Tuesday 19 May 2009

1. The Food Standards Agency Northern Ireland (FSANI) held an event for its stakeholders to examine in detail, the Agency's Strategic Plan for 2010 to 2015 on Tuesday 19 May 2009. The event was chaired by Quintin Oliver, Stratagem and moderated by the chair and members of the Northern Ireland Food Advisory Committee (NIFAC), assisted by FSANI staff.
2. The strategic context was highlighted by presentations from the Chief Executive, Tim Smith and FSANI Director Gerry McCurdy. The FSA Chair, Dame Deirdre Hutton, also attended the event.
3. Presentations were then given by six stakeholders to set the scene for the debate:
 - A local NGO stakeholder highlighted the need for the FSA to focus on nutrition issues, to reduce the mortality caused by heart disease, and stressed how regrettable it was that due to certain elements in the food industry that the UK does not have one integrated labelling scheme
 - A food industry stakeholder noted that the industry wants to become as engaged as possible in the Agency's strategic planning process, as a way of spreading the Agency's messages more effectively
 - A local government stakeholder highlighted that the previous Strategic Plan has had a huge impact on the reduction of foodborne disease so the Agency should remain committed to food safety and continue its close working with local authorities as a way of measuring key food safety outcomes
 - A NI government agency stakeholder emphasised how important it is to consider local community action to issues identified within the Strategic Plan and the need for prioritisation of all of the issues.
 - A NI government stakeholder commended FSA on how ambitious the Strategic Plan was in terms of its food safety priorities and encouraged greater collaboration with organisations across the island of Ireland
 - A NI government stakeholder commended the Agency on the clarity of the Strategy and welcomed further working to look at the promotion of public health messages as well as looking deeper at health inequalities.
4. After these presentations, attendees were invited to participate in table discussions to look at the three key questions set out in the consultation document. Comments made at the event have been arranged under these three questions overleaf.
5. After the discussions, participants had the opportunity to ask questions and debate issues raised both during the presentations and the discussions at their tables.

Q1. We intend to concentrate our efforts where we can have the most impact on public health. Do you agree that this should be our overall strategic approach (our purpose, objectives and outcomes)?

Purpose

Some attendees felt that a wider purpose is required, due to the importance of partnership working.

Objectives

The group had extremely diverse views on whether the Agency should focus its attention on 'Improving food safety' or 'Improving the balance of the diet'. Under the 'Improve the balance of the diet' objective, it was felt that the outcomes and priorities were not as clearly articulated as the 'Improve food safety' objective.

Outcomes

The group had differing views over the priority of the outcomes, but essentially agreed that they were all of equally high importance. It was recognised that the outcomes are influenced by others apart from FSA, so it is difficult to attribute impact to FSA. The Agency is advised to look for intermediate outcomes that are easily attributable and also measurable. There was also some concern expressed that the proportion of time and resources to be spent on each outcome should be detailed as some are more resource intense than others.

Here are some of the comments made about specific outcomes.

- Outcome FS1 – Change wording to 'Imported food entering the UK market is safe to eat and appropriately labelled.'
- Outcome FS2 – some of the respondents felt this outcome should be prioritised as the FSA is the only organisation leading in this area.
- It was also felt that a risk based approach would be best for Outcomes FS1 and FS2.
- Mid Table Outcome – Change wording to 'A proportionate, risk-based regulatory regime relating to food safety and composition, which is clear about the responsibilities of food business operators and others, and which generates public confidence in food.'
- Outcome HE3 – effecting behaviour change should feature somewhere in this outcome, and it should be widened to include setting outside of the home as well as inside.

The Group also made some specific comments as follows:

Food Safety

- Campylobacter – There are two major poultry players in Northern Ireland. FSA should approach the Poultry Federation to solve issues.
- Consumers have a perception that industry should have food safety sorted.
- The importance of the role played by EHOs in working with SMEs should be recognised.
- Food safety is FSA's unique function so resources should be focused in that area.
- Improved intelligence, knowledge and evidence can help secure resources and improve planning of targeted interventions delivering better outcomes. This will be

critical in the current financial climate where food safety managers will increasingly have to compete for decreasing resources.

- The Agency should recognise that Scores on the Doors (SOTD) can provide an incentive to improve hygiene compliance and therefore food safety. The group were not sure how the Strategic Plan will deliver a single SOTD scheme, considering the Board have agreed to support two schemes.
- Light touch must be right touch – better regulation whilst being proportionate must be effective in improving food safety and targeting worst offenders. Concern was expressed that the previous regulatory regime effectively deskilled EHOs with prescriptive checklists and concentration on numbers doesn't encourage officers to focus inspection on most important areas. The intervention scheme in the revised code of practice goes some way to correct this but the Agency now needs to support district councils in developing the right competences with the focus very much on the verification and validation of HACCP and monitoring arrangements, including reality checks.
- Declining numbers of trained and qualified EHOs is a real concern, as is the decline of sampling numbers and qualified public analysts.
- Resource split between food safety and dietary health should not be 50:50, balance should be in favour of food safety at least 60:40.
- Greater engagement needed with Europe – not just at Commission level but also with EFSA.
- It was felt that more clarity was needed about the word 'imported', i.e. what it means, EU/3rd country, etc.
- It was noted that most food alerts relate to imported food and the complexity and lengthening of the supply chain poses increasing challenges for monitoring the safety and traceability of imports. Respondents welcome the fact that the strategy gives priority to imported food and they support the need to improve intelligence of the global food chain.
- Training, resources and sampling are critical to achieving Outcome FS1.

Dietary Health

- Some respondents felt that the dietary health side of the consultation should be considered as optional for the FSA. Others felt that the dietary health side is quite technical and so it was obvious that it should be included as part of the consultation.
- Nutrition should be looked at from a scientific point of view.
- Many felt that labelling messages need to be simpler and clearer – a uniform labelling system will be difficult to achieve without legislation.

Clear Messaging

- It is the responsibility for Government to deliver clear messages about dietary health.
- Messages need to be more targeted – there are currently too many blanket messages. The Agency need to develop evidence which will enable it to target specific areas. A particular focus should be given to those issues which will offer the biggest benefits in terms of the two objectives of 'Improving Food Safety' and 'Improving the Balance of the Diet'.

Q2. We have described the priorities on which we think we need to concentrate in the 2010 to 2015 period in order to make the most impact. Do you agree these are the right priorities?

Priorities

- The group felt that corresponding consumer focused priorities associated with Outcomes FS3 and HE3 were missing. For example, there should be a priority that details the use of campaigns to effect behaviour change in consumers, and education on how to achieve a healthy diet.
- The priority of understanding the dietary habits and nutritional status of the UK population (under Outcome HE1) is crucial as a baseline. This should be expanded to read 'understanding behaviour that correlates with dietary habits...'
- Consumer demand should be considered as a starting point.
- Priority under Outcome HE3 – 'Increased consumption of healthier foods' – the group felt that there needs to be something to compare this to, i.e. healthier than what?
- Some felt that there are too many priorities in the proposed plan and some of those detailed are at too specific a level e.g. SOTD. The risk is that focus will be lost. Need to capture and reinforce the high level priorities that must be at the forefront of the Agency's thinking at all times
- Priorities should be simplified with less detail, which will provide greater flexibility for how we move forward particularly where the goal posts move.
- There should be greater emphasis on the cross-cutting priorities at the bottom as these are in fact the fundamentals of achieving any of the specific priorities.
- It is not adequate to say that we will 'increase understanding of how to change behaviour' as we need to go beyond that and start to effect changes in behaviour if we are to make real change - applies equally to food safety as well as dietary health.
- 'Collaboration', whilst mentioned is not emphasised sufficiently in the priorities.
- The priority under Outcome FS2 details tackling campylobacter and salmonella as a priority however, the more deadly listeria is on the increase, which is a real concern for an aging population.
- Largely the group agreed that there isn't anything in the proposed priorities that FSA should not be doing. However, a small but influential minority challenged whether the Agency should be spending any resource on dietary health.

Partnership Working

- Some attendees highlighted that the Strategic Plan should place more emphasis on partnership working – including details of synergy between FSA and the other organisations on the island of Ireland who have responsibility for food safety (Food Safety Authority of Ireland) and the Food Safety Promotion Board.
- It was felt that FSA needs to consider moulding the habits of the very young, in school settings; and tackling specific hot spots of health inequalities. Special consideration needs to be given to looking at areas where there are shortened lives and increased morbidity.
- Obesity needs to be addressed using a partnership approach. It should be considered in the context of needing to have the other piece of the jigsaw, e.g.

exercise and dietary health, even though exercise does not come under FSA's remit.

- The Strategic Plan should identify partners whom the Agency can work with. Public Health Pilot schemes are being planned with NI district councils and representatives from other organisations such as the Public Health Agency. The Agency should work with these schemes to get nutrition on the agenda now.
- Retailers have a major influence over consumer choices. The Agency needs to get on their wavelength as they will continue to promote their own agenda.
- The need for greater partnership and collaboration on dietary health was identified to prevent duplication of effort. Clarity of roles is required, in particular exactly what the FSA should do and where its responsibilities stop. It will be necessary to collaborate with the Food Safety Promotion Board to agree who does what and make appropriate use of financial resources.
- Duplication of effort across partner organisations must be avoided. FSA should not do anything that others have a clear mandate to progress.

Behaviour Change

- The Plan outlines a requirement for two models of consumer engagement: Consumers expect safety controls; Consumers have to change their behaviour in relation to dietary health.
- The group felt that affecting behaviour change should be more prominent in the outcomes. The highest resulting priority would be to understand how good behaviour change can be effected – this would perhaps lessen the need for some of the earlier work on reformulation.
- Is it about helping consumers make healthier choices or smarter choices, e.g. frozen fruit and veg, value brand meat?
- The Plan should include a priority on teaching people how to prepare food.
- The Plan should aim to try to dispel myths.
- Concentrating on labelling means a focus on the choice agenda – doesn't mean people will change behaviour. The purpose of the strategy therefore not just about choice.

Q3. We have set out some key questions we need to address to ensure we have the science, evidence and analysis we will need to support achievement of the proposed FSA strategy. Please let us have your views on the answers to these questions. Have we missed any key issues?

The group did not discuss scientific issues specifically but gaps in the Strategic Plan proposal were identified and are detailed in the comments below. Overall it was felt that whilst it was difficult to spot any real gaps, the group felt that there was nothing significant missing.

Gaps

- It noted that the Strategic Plan for 2010 to 2015 must include provision for equality impact assessments. This is especially relevant in Northern Ireland because of the need to adhere to Section 75 of the Northern Ireland Act 1998.
- More consideration should be given to health inequalities, with more emphasis on communicating information to those who need it most.

- The group recognised the unique enforcement system in Northern Ireland, and felt that the Strategic Plan should take into account the significant re-organisation of local authorities resulting in the Review of Public Administration (RPA).
- Consultation document should provide clear recognition that there are 4 sections of the UK. Northern Ireland shares territories with other bodies, which has a big impact on resources. The challenge is to make sure there is no duplication.
- The food poverty link difficult to make in this plan. There needs to be more of a social marketing focus as consumers need support in order to make changes.
- The Agency needs to gain an understanding of barriers to improving the balance of the diet, otherwise the Strategic Plan will develop in isolation.
- A suggestion was made to include cross cutting themes, e.g. inequalities, sustainability.
 - Environment – sustainability. It is included in the consultation but is a bit light on detail.
 - Disadvantaged and vulnerable groups are missing from the plan – useful to have inequalities mentioned prominently. The burden is often on these groups. Simply by concentrating on the average doesn't necessarily mean you are covering differences and covering statutory equality requirements.
- Security and resilience of the food chain needs to be considered.
- Environmental impact of food system on wider health, e.g. carbon footprint, declining fish stocks, greenhouse gases, etc.
- Effect of the global food market, e.g. bio fuels affecting food prices.
- A clear legislative framework exists for food safety in defining the role of FSA and EHOs. No such framework exists for health promotion. EHOs are at the centre of health promotion in its widest context and are best placed to lead this agenda in NI to tackle health inequalities.
- Strategic Plan should be developed to clearly identify the role which district councils play in delivering the objectives.
- FSA needs to be more visionary to become SMART at the right level, i.e. to develop outcome based performance measures at next layer below plan as currently detailed.
- Action at the local level needs to be highlighted. The Agency should ensure that it is not seeking to drive forward only with multinationals whilst ignoring SMEs, where the real problems and challenges lie.
- The group did highlight that there is no mention about influencing and this was felt to be particularly important in respect of advertising of foods.

Specific Comments relating to the Economic Downturn

- Recession - Percentage spend on food has been driven down – consumer choices have changed.
- Recession – Consumers are trading down, possibly buying cheaper products with higher fat, salt, etc. FSA shouldn't apply social judgements as value products but just be a slightly lower grade but are still good quality.