

Response ID ANON-SFPU-RNUZ-D

Submitted to **A Food Surveillance Strategy For Scotland**

Submitted on **2017-08-07 10:51:11**

Introduction

1 What is your name?

Name:

john points

2 What is your email address?

Email:

john.points@btinternet.com

3 What is your organisation?

Organisation:

Institute of Food Science and Technology

4 Please note that Food Standards Scotland may publish details that you supply in legitimate pursuit of the functions of the organisation. As the publication of responses in full may include personal data (such as your full name and contact address details) do you agree to the publication of your personal details? If no objection is received we will assume that you consent to full disclosure of your personal details and these may be published.

Yes

Food Surveillance Strategy

5 In your view, is the overall model described (i.e. the approach to strategic planning and information gathering, management, analysis and investigation) the most appropriate to achieve the intended outcome?

Yes

If you answered no, please explain briefly your reasoning, and indicate which alternative approaches you consider to be more appropriate. If you answered yes, what do you think are the key advantages of the proposed approach?:

As outlined in the responses to further questions below.

6 In your view, will the sources of data and information described in the Strategy provide FSS with the intelligence required to identify risks to the Scottish food chain?

No

If you answered no, please explain briefly your reasoning, and indicate what information sources you consider are missing from those identified.:

The information sources described in the Strategy are all valuable. The IFST particularly welcome the development of the Food Information Network. Horizon scanning could be strengthened, however, by a more systematic approach to monitoring global commodity price movements or production shortfalls for key raw materials at risk from fraud. For example, the price differential between Durum wheat and soft wheat, or the price differential between different varieties of potato. As well as surveillance by analytical testing, FSS could instigate or co-ordinate surveillance by audit. This is particularly appropriate to the Scottish fishing industry: because of the requirement to keep catch records, any fraud in the fishing industry must, by definition, leave a paper trail.

The above activities are, as intimated in the proposed strategy, best undertaken in collaboration with other competent authorities in the UK, Europe and, for example with FDA and USP (<http://www.foodfraud.org/>) in the US and Food Standards Australia New Zealand (FSANZ), <http://www.foodstandards.gov.au/Pages/default.aspx>

Food Surveillance Strategy

7 The strategy describes the need for a structured procedure for horizon scanning which will allow FSS to identify emerging and future risks to the Scottish food chain. Do you agree that the development of horizon scanning capability should be a priority for FSS?

Yes

8 In your opinion, or based on your experience, what does a structured process for horizon scanning look like? Could you provide examples of approaches which have been applied elsewhere that FSS would be able to learn from when developing its own horizon scanning processes?

Please provide details below.:

A structured approach to horizon scanning, for fraud or for contaminants resulting from poor practice, must start with assessing the opportunity and incentive. In the case of contaminants, this would include systematic analysis of data such as FVO Country Profiles and Inspection Reports (which give a view of the regulatory and enforcement weaknesses in the country of origin of at-risk ingredients). For fraud, it includes systematic analysis of commodity prices and supply shortages. In both cases, it includes a systematic procedure to gather information from those specific industry sectors who have people on-the-ground and local knowledge.

Although analysis of trends in laboratory results and safety incidents is a useful tool, there is a danger of over-reliance. An inherent flaw, even in large global data-sets such as Fera's Horizonscan, is that they do not record the negative results. Therefore, it is impossible to model trends in the % incidence of an issue. A report of a positive result will trigger more testing by all stakeholders, so an apparent upward trend in incidence is usually just an increase in awareness and testing for a particular issue.

One dataset which includes negative results, and is available to the FSS though not to industry, is the EU TRACES database. This has been under-used in the past because it is difficult to interrogate, but should be a valuable resource in the animal products sector.

The FSS would benefit from benchmarking their horizon scanning systems with recognised leaders in this approach in the food industry, such as Nestle's Infant Formula Milk business or some of the large European supermarket chains.

There should be special emphasis on traders and brokers with specific efforts to establish regular two way information exchange relationships with those that are registered as food businesses and are reputable, concentrating, for example products with long or complex supply chains.

There are good models for food authenticity risk analysis (e.g. the Young's Seafood Limited - Upstream Supply Chain Food Fraud Risk Analysis Process), cited at Annex J beginning p 110 in the Elliott Review Final Report.

Non-traditional surveillance information gathering might also be considered. An example would be as suggested in the proposal. cooperation with other statutory agencies, e.g. HMRC might identify individuals with a lavish lifestyle in the low margin food industry, which may raise suspicions. This aspect should be reflected in the diagram at paragraph 35 in Annex B.

Food Surveillance Strategy

9 In your opinion, what are the key factors that FSS should take into account when prioritising surveillance activity targeted to food safety and authenticity?

Please provide details below.:

A focus on food industries and sectors that are of strategic and economic interest to Scotland. FSS should work closely with other national food safety authorities to avoid replication of effort, and to pool information.

The IFST welcomes the FSS objective of supporting Scottish laboratory capacity. There are examples where the development of a Scottish centre of laboratory expertise would directly benefit a strategic industry, such as a local shellfish toxin expertise centre to support the West Coast shellfish harvest areas. The creation of a shared scientific service has been recommended in several reviews and much work has been done to move this forward however high level leadership is required to make it happen. Thus IFST particularly applauds the potential leadership role that FSS proposes to adopt to assist in the development of more integrated food laboratory services across Scotland (paragraph 29 of Annex B).

10 This Strategy has a clear focus on the interests of Scottish citizens and consumer choice, but to what extent do you consider that it should also have a role in protecting the food and drink industry in Scotland and future export markets?

Please provide details below.:

This strategy would underpin confidence in the provenance of Scottish exports, many of which have a price premium based upon that provenance. However, the scope of the strategy does not include counterfeit brands which are both produced and sold overseas – an issue with the potential to undermine the Scottish whisky industry. The strategy would be strengthened if it addressed this risk, by such measures as sharing "authentic" reference databases with overseas authorities to allow and encourage them to identify counterfeit goods.

Food Surveillance Strategy

11 Based on your knowledge and experience of public health and/or the food and drink landscape in Scotland, what key areas that you would consider to be an immediate priority for FSS's food surveillance strategy?

Please outline below, providing justification for your suggestions.:

IFST welcomes to intent of this question but feels responses from Scottish consultees will be more valuable

12 In your view what are the key evidence gaps that will need to be addressed in order to enable FSS to target its surveillance activities effectively?

Please provide details below.:

As above, surveillance data sets, including industry data-sharing, that include negative as well as positive results. Financial audit data, particularly in the fishing industry. Analysis of commodity data (price and production) for key raw materials.

Food Surveillance Strategy

13 In your view what are the most important partnerships that FSS will need to develop or strengthen in order to develop an effective horizon scanning capability for predicting risks to the food chain in Scotland? Are there any stakeholders not mentioned in this document that you think FSS will need to develop more effective partnerships with in order to deliver this Food Surveillance Strategy?

Please provide details below.:

The key partnerships are mentioned in the Strategy document. Development of industry data-sharing forums such as the Food Information Network is vital. To build industry trust, it is important that these are seen as a two-way sharing of intelligence.

14 In your opinion, what would be the best way to improve data sharing between FSS and other government departments/agencies?

Please explain below.:

IFST welcomes to intent of this question but feels responses from Scottish consultees will be more valuable

Food Surveillance Strategy

15 In your opinion, what would be the best way to improve data sharing between FSS and the food industry?

Please explain below.:

As above, build upon the start that has been made with the Food Information Network. The FSS could also build bilateral relations with trade bodies representing the specific industries that are strategically important to Scotland

16 In your opinion, how much emphasis should FSS be giving to the role of food sampling as a means of generating evidence to support its surveillance activities?

Please provide details below.:

Sampling is important and the commitment given in paragraph 21 of Annex B that FSS continues to fund a sampling grants programme to ensure current levels of LA sampling in Scotland are maintained is welcomed with approval. However horizon scanning activities should be given the highest emphasis. More leverage could be gained from sampling by reviewing the way that budgets for testing different contaminant classes are compartmentalised within different government departments. For example, in principle the same sample could be tested for pesticides, mycotoxins, and a range of process and environmental contaminants, at relatively little incremental cost compared to testing for pesticides alone. This is the approach taken in countries such as The Netherlands, and in many industry test schemes.

The best use should be made of existing data. The IFST welcome the intent to pool and analyse test data from Local Authorities; we would like to see this expanded to include test results from Border Inspection Posts and Designated Points of Entry

Food Surveillance Strategy

17 In your opinion, what are the key components of an effective laboratory infrastructure and capability for delivering food surveillance? What particular analytical capabilities will be most critical in delivering FSS's vision of Scotland having a world leading food surveillance system?

Please provide details below.:

We refer back to Q5 on this and add that many of the key components of an effective laboratory infrastructure and capability for delivering food surveillance already exist in some form in Scotland. However a shared scientific service would enable the development of centres of expertise with world class potential. Of particular importance are high level capabilities in the interpretation of NGS outputs (the sequence reads can be obtained relatively inexpensively from global providers), mass spectrometry, MS, (investment in new generation instruments will provide considerable advances in sensitivity the costs of which can be offset by reduced need for sample clean-up) and time of flight MS. Access to epidemiology, toxicology, statistical and chemometric services in an integrated manner will facilitate world class surveillance.

Most modern food authenticity tests are based upon statistical comparison of a range of parameters with a reference database of authentic samples. Such databases need to be comprehensive and robust enough to cover a myriad of potential variables in the authentic population. Each database is specific to a particular food type. Building and maintaining good databases is expensive. Testing therefore lends itself to an international network of specialist laboratory expertise, rather than replicating all testing in every country. It is important that the FSS recognise this, and build links with existing recognised laboratory centres of expertise in other countries (such as for honey authenticity – Germany – or fruit juice authenticity – France).

Obvious centres of expertise to nurture in Scotland would be for fish species/origin testing (e.g. databases of fat profiles, stable isotope profiles, protein profiles, using both advance mass spectrometry and DNA/biological/genetic testing techniques) and whisky authenticity (again, using advanced “-omics” techniques, as well as more traditional organoleptic methods).

For public health, it is important that Scotland has a strong laboratory infrastructure to support shellfish hygiene and toxin testing.

18 In your opinion, how can FSS engage most effectively with consumers to ensure their interests are fully recognised in the delivery of this strategy?

Please provide details below.:

IFST welcomes to intent of this question but feels responses from Scottish consultees will be more valuable

Food Surveillance Strategy

19 In your view, what would be the best approach for evaluating the effectiveness of the surveillance model proposed by this strategy?

Please provide details below.:

Quantified feedback from the Scottish food industry and informed consumer organisations as to how useful FSS risk-communication and published results are informing their own risk-assessments and risk-management of their own products and supply chain.

20 Is your work relevant to the aims of this strategy and if so, do you feel you could contribute to the delivery of our key objectives for effectively identifying and responding the risks to the food chain in Scotland?

Yes

If you answered yes please could you describe how you could work with FSS to help us to achieve our objectives.:

The IFST would welcome the opportunity to contribute to working groups looking at risk assessment and horizon scanning.

Food Surveillance Strategy

21 Do you have any additional comments on the content of the strategy?

Please provide details below.:

All comments are covered above.