MEMORANDUM FROM RESEARCH COUNCILS UK (RCUK) IN RESPONSE TO THE CONSULTATION ON THE REVISED FOOD STANDARDS AGENCY STRATEGY FOR 2010 TO 2015

Introduction

1. Research Councils UK (RCUK) is a strategic partnership set up to enable the seven UK Research Councils to work together more effectively and enhance the overall impact and effectiveness of their research, training, innovation and public engagement activities, and contributing to the delivery of the Government’s objectives for science and innovation. Further details are available at www.rcuk.ac.uk.

2. This evidence is submitted by RCUK on behalf of the Research Councils listed below and represents their independent views. It does not include or necessarily reflect the views of the Knowledge and Innovation Group in the Department for Business, Innovation and Skills. The submission is made on behalf of the following Councils:
   - Biotechnology and Biological Sciences Research Council (BBSRC)
   - Economic and Social Research Council (ESRC)
   - Medical Research Council (MRC)

3. This response focuses mainly on research, training and public engagement, in keeping with the Research Councils’ missions and roles.

Food Standards Agency Strategy for 2010 to 2015

4. RCUK welcomes the opportunity to comment on the proposed revisions to the FSA’s strategy for 2010-15.

5. RCUK remains of the view that the FSA’s evidence-based approach to food safety and health is central to its success. It is vital that this approach is maintained and enhanced through:
   - optimal use of existing data;
   - identifying the evidence gaps most relevant to public health, and commissioning high-quality research in these areas;
   - rigorous peer review, not only of research funded, but also of the research results on which policy is subsequently based.

Question 1: “The proposals for the revised strategic plan follow an evidence based approach and take account of new information and changes to our environment. Do you agree with the changes we propose to make to the strategic plan? If not, please explain briefly your reasoning.”

6. RCUK agrees that the proposed changes to the FSA’s strategy are appropriate to the revised responsibilities of the Agency, following the transfer of responsibility for nutrition policy in England to the Department of Health (DH). However, as the Research Councils cover the whole of the UK, RCUK considers it important that nutrition policy does not become fragmented. It is crucial that the FSA works with DH, the devolved governments and other bodies as appropriate to ensure coordination of nutrition policy across the UK, and the new strategic plan should emphasise this.
7. Paragraph 35 of the consultation document notes that the project on developing and promoting integrated advice for consumers on food issues has been closed. RCUK would encourage the FSA to consider how advice on healthy eating might be provided in the future; if this is to be through DH, it should be integrated with the FSA’s nutrition advice in Scotland and Northern Ireland.

8. As well as nutrition policy, it is equally important that nutrition research does not become fragmented. The FSA has been an important and substantial contributor to nutrition research in the UK. It has supported key research into nutritional needs and status, together with some of the most detailed and important dietary intervention studies. It is important that there is a clear and transparent plan for how best to continue the areas of nutrition research previously supported by FSA, which are vital to underpin future policy and advice to consumers.

9. FSA retains responsibility for nutrition advice in Scotland and Northern Ireland and it must retain the capacity to amass new evidence; logically, this should be integrated with activity in England and Wales. Accordingly, there is a need for discussions with RCUK and DH to coordinate future nutrition research funding. It is not clear what proportion of its research spend FSA plans to invest in diet and health research in the future.

10. The single project in Scotland focused on consumer understanding of diet and health is useful, and it is timely to review the Eatwell plate. However, it is vital that this information is shared with other parts of the UK since it is highly desirable to have a single, consistent, shared communication tool on which to build dialogue with consumers about diet and health.

11. RCUK recognises the importance of reducing the impact of food allergies and supports the increased emphasis on allergens in the revised strategy. There is already close alignment and opportunity for joint working between the FSA and the Research Councils in this area, as appropriate to their respective remits. The recent MRC/FSA highlight notice[^1] focuses on improving understanding of immunobiological processes. Opportunities for joint working with BBSRC may include developing ways to identify and reduce the allergic potential of foods.

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**Question 2:** “Are there any additional changes to the plan we should consider and upon what evidence would these changes be based?”

12. RCUK would support the inclusion in the FSA’s strategy of outcomes and priorities focused on food quality, as well as food safety. Ensuring a sustainable, affordable, secure supply of high quality food is a key concept within the multi-funder Global Food Security programme.

**Question 3:** “We have set out some key questions about the science, evidence and analysis we will need to support the proposed changes to the Strategic Plan (paragraphs 54 to 59). Please let us have your views on these questions.”

**Q3 a.** What are the major gaps in the science, evidence and analysis that need to be addressed in order to reflect the revised outcomes outlined above?

[^1]: [www.mrc.ac.uk/Fundingopportunities/Highlightnotices/FoodAllergyResearch/MRC007666](www.mrc.ac.uk/Fundingopportunities/Highlightnotices/FoodAllergyResearch/MRC007666)
13. A better understanding of behaviour, and influencing behaviour, in respect of food safety (in the home, in business, among regulatory bodies) is one area in which further research is required.

14. As highlighted in RCUK’s response to the previous FSA Strategy consultation in 2009, research into what constitutes a healthy diet, including changing requirements throughout the life course, is required to underpin the development of advice and guidance on improved dietary balance.

Q3 b. Who should we be working with to address these gaps and to use the science, evidence and analysis effectively?

15. The Research Councils will be pleased to continue and to further develop working with the FSA to address science and evidence needs in areas that fall within their respective remits. RCUK-funded research such as that carried out under the Lifelong Health and Wellbeing, Living with Environmental Change and Global Food Security cross-Council programmes will continue to contribute insights to a range of topics of interest to the FSA.

16. BBSRC’s Government Partnership Award scheme provides a valuable mechanism for supporting research of mutual interest to the FSA. BBSRC would encourage greater use of this scheme by the Agency. ESRC supports knowledge exchange activities such as policy seminars and Knowledge Transfer Partnerships, which may also be of interest to the Agency.

17. RCUK welcomes the references in the Science and Evidence Strategy to joint working with BBSRC and the Department for Environment, Food and Rural Affairs on Campylobacter, and to the cross-Government Food Research Partnership. It would also be appropriate for the Strategy to highlight the multi-funder Global Food Security programme, which will help ensure coordination of research and related activities with other funders, prevent duplication, and maximise value for money and impact from research investments.

Q3 c. Have we missed any other key issues for our science?

18. Under Evidence Theme 1 of the Science and Evidence Strategy, it is not clear that consideration has been given to whether there is sufficient capacity within the UK research base to identify and tackle potential new and emerging food- and feed-related threats to public health.