

Health, Social Care and Sport Committee
Tuesday, 17 February 2026
8th Meeting, 2026 (Session 6)

Food Standards Scotland and the first national Good Food Nation Plan– Note by the Clerk

Background

1. FSS is a non-ministerial public body, reporting directly to the Scottish Parliament and working closely with Scottish Ministers on various areas of its remit. FSS operates independently of Ministers and industry, providing impartial, evidence-based advice. As the public sector food body for Scotland, its remit covers all aspects of the food chain concerning public health, aiming to protect consumers from food safety risks and to promote healthy eating.
2. Under the [Food \(Scotland\) Act 2015](#), FSS has three objectives to protect the health and wellbeing of consumers. These are:
 - To protect the public from risks to health which may arise with the consumption of food.
 - To improve the extent to which members of the public have diets which are conducive to good health.
 - To protect the other interests of consumers in relation to food.
3. During this parliamentary session, Food Standards Scotland has previously undergone periodic scrutiny by the Committee on three separate occasions:
 - [Tuesday, 24 January, 2023](#)
 - [Tuesday, 7 May, 2024](#)
 - [Tuesday, 10 June, 2025](#)
4. [Food Standards Scotland Strategy for 2026 – 2031](#), “A safe, authentic and healthier food environment that Scotland can trust”, was published on 11 February 2026. The strategy includes three key priorities:
 - Public health and consumer protection
 - Evolving and reforming the regulatory landscape

- Providing an effective public service for the people of Scotland
5. In advance of their appearance at today's meeting, Food Standards Scotland have provided a background briefing, which can be found at Annex A. The briefing refers to the Scottish Food Crime and Incidents Unit's Annual Report, which can be found at Annex B.

First National Good Food Nation Plan

6. The [Good Food Nation \(Scotland\) Act 2022](#) places duties on Scottish Ministers, local authorities and health boards to produce Good Food Nation Plans. These Plans will set out the main outcomes to be achieved in relation to food-related issues, the policies needed to do this and the measures that will be used to assess progress.
7. These Plans are intended to deliver outcomes which support, amongst other things:
- social and economic wellbeing
 - the environment
 - people's health and physical and mental wellbeing
 - economic development
 - animal welfare
 - education
 - child poverty

Scottish Ministers, local authorities and health boards must report on progress towards achieving the outcomes set out in their Plans. Reports must be produced every two years, and the Plans must be reviewed at least every five years.

8. The [proposed version of the National Good Food Nation Plan](#) was published by the Scottish Government along with a number of supplementary documents on 27 June 2025. This Committee worked closely with the Local Government, Housing and Planning Committee and the Rural Affairs and Islands Committee to undertake co-ordinated scrutiny of the proposed Plan. The Committee held evidence sessions on the Plan at its meeting on [2 September 2025](#) and published its [report](#) on the proposed plan on 30 September 2025.
9. The Scottish Government published the first [National Good Food Nation Plan](#) on December 2025, along with an [accompanying statement](#).

Today's meeting

10. At today's meeting, the Committee will be taking evidence from representatives of Food Standards Scotland (FSS) and The Living Good Food Nation Lab

(University of Edinburgh), providing an opportunity for an update and discussion about various topics, including the role and remit of Food Standards Scotland and the finalised National Good Food Nation Plan.

Clerks to the Committee
February 2026

Annexe A: Food Standards Scotland's evidence Health, Social Care and Sport Committee Evidence session, 17 February 2026

General

Food Standards Scotland (FSS) was established in April 2015 as the new public sector food body for Scotland, to protect the health and wellbeing of consumers in relation to issues around food and feed law, food standards and dietary health. Our key priorities are public health and consumer protection in relation to food, taking action to address preventable foodborne illnesses, helping to tackle food crime and providing advice which promotes a healthy diet. FSS is part of the Scottish Administration but is independent of Scottish Ministers and is directly accountable to the Scottish Parliament, currently reporting to the Health, Social Care and Sport Committee.

Ongoing scope and focus of Food Standards Scotland

Food Standards Scotland's new strategy for 2026 – 2031, will build on the strong foundations laid since our establishment in 2015. We aim to achieve our vision “for a safe, authentic and healthier food environment that Scotland can trust”, through the delivery of a rigorous system of food and feed safety standards and regulations that ensure policy development, operational delivery, guidance and public communications are transparent and evidence based.

Underpinned by our values, over the duration of our Strategy we are working towards three strategic priorities that will enable us to make a difference to Scotland:

- Public health and consumer protection - We will use robust science and clear evidence, risk assessments and investigations to guide our decisions and recommendations. This will help us take the right actions to keep food safe and support healthier diets, protecting people in Scotland from foodborne illness and the impacts of poor diet.
- Evolving and reforming the regulatory landscape - We will work towards creating, influencing, developing, and implementing a regulatory and enforcement framework which is efficient and effective in strengthening compliance and public trust in Scotland's food system.
- Providing an effective public service for the people of Scotland - We will ensure the services we deliver are effective, efficient, inclusive and sustainable.

FSS looks forward to collaborating with partners, stakeholders, and the public to deliver our new strategy over the next five years. We also recognise the challenging fiscal climate in which both FSS and our delivery partners, including local authorities, and other stakeholders, must operate.

The National Good Food Nation Plan

FSS is Scotland's independent food regulator with statutory objectives that cover the entirety of the food chain. We will work with the Scottish Food Commission to ensure our respective remits complement and support one another. We are also considering the development of a

Memorandum of Understanding between FSS and the Scottish Food Commission to provide a clear understanding and demarcation of our respective roles, remit and areas of work.

Our vision aligns with the ambitions outlined within the first National Good Food Nation Plan. We, therefore, welcome the National Good Food Nation Plan, and the work that has gone into creating this significant document. FSS considers that the National Good Food Nation Plan highlights the breadth of activity already happening in Scotland, which supports the vision for a Good Food Nation.

FSS recognises that the National Good Food Nation Plan, and forthcoming local authority and health board Good Food Nation Plans, present an opportunity to also support Scotland's food and drink sector, and to transform our food landscape, whilst driving the changes necessary to support food systems transformation. FSS also supports the six outcomes set out in the National Good Food Nation Plan. To achieve success in progressing towards achieving these outcomes, it is the view of FSS that further clarity on timescales of the formation of the local plans, resource allocation to support their development and providing clarity on the role of the Scottish Food Commission in meeting food system needs. We believe these actions must be taken forward at pace.

Monitoring and evaluation will be key to assessing progress. FSS welcomes the [Initial Monitoring Framework - National Good Food Nation Plan - December 2025](#). The framework establishes a baseline dataset of indicators across the 6 outcomes and provides a useful reference point for future progress assessments. It sets out 51 high-level indicators to assess progress against the six strategic outcomes of the National Good Food Nation Plan. The Scottish Dietary Goals (SDGS) are explicitly included as key indicators within Outcome 3: A Healthy Population, which focuses on improving diets and reducing diet-related health conditions in Scotland.

The Food environment in Scotland

Creating a healthier food environment is critical to improving public health in Scotland and to reducing persistent health inequalities. Poor diet is a major contributor to ill health, and the current food environment makes it easier to access cheaper unhealthy, nutritionally poor food. These foods are often more convenient and heavily promoted, reinforcing unhealthy dietary patterns, particularly for lower-income groups. Our [recent data](#) shows that diets are especially poor in children and young people, particularly those living in areas of deprivation.

Tackling this requires shifting the primary focus from individual responsibility of consumers to making better choices regarding our food environment. In line with the Christie Commission's public service principles of prevention, partnership, and empowerment, we continue to advocate for upstream interventions that reshape the food environment in the places people live, work, shop, and eat.

However, it is also important to articulate clearly that structural and environmental change does not replace individual responsibility, it enables it. Individuals continue to make daily food choices, but these choices are shaped by availability, affordability, marketing, and social norms. Structural measures create conditions in which healthier choice becomes the easier

choice, meaning individuals are supported rather than burdened with responsibility they cannot shoulder alone. Without supportive environments, calls for personal responsibility risk perpetuating existing health inequalities rather than reducing them.

FSS's approach to driving dietary improvement is grounded in robust evidence, monitoring, and a health-first ethos with consistent public health messaging, which is supportive, non-stigmatising and practical. Our tool, [Eat Well, Your Way](#) helps consumers to make sustainable changes in the context of their own lives and complement broader policy advice. However, misinformation across digital and media platforms makes it challenging to remain a trusted source. To amplify evidence and strengthen engagement, we focus limited resources on scalable, cost-effective interventions, such as digital content and targeted media engagement. For example, our recent video on the food environment explains how commercial, retail, and policy factors shape everyday choices.

We welcome the Scottish Government's commitment to measures designed to [improve diet and healthy weight](#) which include restricting promotions on food and drinks high in fat, sugar, and salt (HFSS). When implemented, this will mark a significant first step forward in supporting healthier food environments. We still need reformulation of products to address marketing and promotions in favour of healthier options and improve food and drink provision in both retail and out-of-home sectors. To progress these shared objectives, we actively support the Scottish Government's Reformulation for Health Programme and collaborate closely with the Scottish Government and Public Health Scotland, including contributing to the development of an Eating Out, Eating Well framework for out-of-home outlets.

Significant challenges remain in regions across Scotland. The ongoing cost of living crisis continues to make healthy food less accessible for many, and voluntary industry efforts have not delivered the level of change needed. Mixed messages from media or industry can also create confusion and undermine confidence in public health messaging. Resource pressures and slow policy decisions have stalled momentum, and reliance on voluntary measures did not deliver the level playing field required. A healthier and more sustainable food system requires stronger leadership, faster action, and more mandatory measures. including at a UK level. Collaborative working across governments, public bodies, and industry to meet Good Food Nation duties is crucial to achieving long-term improvements in dietary health for everyone in Scotland.

FSS is engaged with UK and Scottish Government in both the UK food strategy, and the Good Food Nation work. We fully recognise that some of the levers to improve dietary health sit with the UK Government. Against this background, FSS welcomes the recent publication revised Nutrient Profiling Model (NPM); [Nutrient profiling model - GOV.UK](#) Whilst it has not been applied yet, for HFSS advertising and promotion it could reduce children's daily calorie intake by up to 30% compared with the current model. Given the current levels of child obesity this cannot be ignored.

FSS also welcomes UK Government plans to introduce mandatory healthy food sales reporting for all large companies in the food sector to then set new targets on the average healthiness of sales. This was included in the UK Government 10-year health plan published in June 2025 and has been a core part of previous iterations of UK food policy for some time.

[Fit for the future: 10 Year Health Plan for England](#) This is being explored on a four-nations basis and expected to be consulted on in spring 2026.

Food security, safety and biosecurity

FSS is reliant on import controls carried out elsewhere in the UK. We have not undertaken any separate risk assessment of the impact of the BTOM roll out in Scotland but have no reason to disagree with FSA's statement from their "One Year on" Board paper in February last year, that the: "overall qualitative assessment is that the implementation of the BTOM has contributed positively to our ability to manage risks posed to food and feed safety from commercial imports from the EU and has maintained the assurances that already applied to RoW imports."

A change in border regime with the EU under an SPS deal will not necessarily affect the volume of illegal imports coming into Great Britain. Standard import checks apply to standard legal imports which pre-notify the authorities in Great Britain of their intention in line with legal requirements. Illegal imports do not make themselves visible in the way that formal i.e., BCP-based import checks are designed to test.

With reference to the importation of illegal meat, we recognise both the points made by EFRA, and understand the UK Government's response, particularly considering current SPS negotiations. Like so much of the enforcement landscape, effectiveness is resource dependent. Given that most imports enter the UK via ports on the south coast we rely on those ports being fully resourced to conduct the necessary actions to prevent illegal imports. We also recognise that the data sharing picture is fragmented – FSS has suboptimal access to data for legitimate imports, and data requirements for anything that is illegal whether by intent or otherwise is a different matter altogether.

Food law enforcement

FSS considers that a sustainable food system requires a sustainable food law enforcement regime. This is an essential measure not only to protect public health, but also to support a vibrant food industry to operate and access markets. By way of further background, only 53% of the required food law enforcement resource is in post. A continued decline in resources and staff numbers within Local Authority Environmental Health functions presents a significant risk to the current and future successful delivery of food Official Controls (OCs) and action is urgently required. SAFER is FSS's strategic response to risks around the food law delivery platform in Scotland.

Meat charges

FSS operates a cost-recovery model for meat OCs, however no slaughterhouse or game handling establishment in Scotland pays the gross cost of FSS OC delivery with small rural abattoirs receiving the largest discount. FSS has worked closely with the meat industry in Scotland to agree with the model used to charge the sector for the cost of OCs, and to find efficiencies to keep costs down.

Food crime

Food crime is a financially motivated crime that can have serious health consequences for consumers where products have been adulterated, substituted or their authenticity has been misrepresented. The risks for those with allergies are significant. The economic impact on the UK is also substantial, and it is estimated that food crime costs the UK up to £2 Billion per year, affecting the food sector and the wider economy as a whole. Recent cases investigated by the SFCIU include the Scottish Tea fraud case and tackling counterfeit vodka. Food Standards Scotland attaches a copy of the SFCIU's Annual Report [Annexe B] on food crime which was previously submitted to the Scottish Parliament's Criminal Justice Committee.

Footnote: [Biosecurity at the border: Britain's illegal meat crisis: Government Response](#)

Annexe B: Scottish Food Crime and Incidents Unit (SFCIU) Annual report – June 2025

Introduction

In April 2015, Food Standards Scotland (FSS) was established under the Food (Scotland) Act 2015 as the new public sector food body for Scotland. FSS is a non-ministerial office of the Scottish Administration, independent from Scottish Government Ministers, and accountable to the Scottish Parliament, currently reporting to the Health, Social Care and Sport Committee.

On 25 September 2024, at the evidence session on food crime, attended by Ron McNaughton, Head of the Scottish Food Crime and Incidents Unit (SFCIU), and Ian McWatt, Deputy Chief Executive of Food Standards Scotland (FSS), the Criminal Justice Committee agreed that it would welcome an annual report from the SFCIU on its work in tackling food crime; Scottish Parliament, Criminal Justice Committee, Official Report, 25 September 2024, Col.23. This Annual Report covers the period 1 April 2024 to 31 March 2025.

The report aims to outline the following:

- Current SFCIU food crime control strategy priorities
- Investigations undertaken
- Case studies
- Food crime prevention
- Multi-agency and partnership work
- Future activities

Food crime is described as serious fraud and related criminality in food supply chains and has an estimated cost to the UK of around £1.96 billion per year¹. Crime targeting the food chain causes serious harm to consumers, damages confidence in food supply and adversely affects business and UK food security.

Although the majority of food and drink on sale in Scotland and the UK is safe and authentic, the food industry remains an attractive target for criminals as economic pressures, changing consumer demands, environmental impacts and geopolitical events create new opportunities to commit crime.

Control Strategy

The SFCIU Food Crime Control Strategy outlines the Unit's current priorities. Through a risk analysis and intelligence led process these have been assessed as

key threats and are the focus for tackling, mitigating and preventing food crime in the food, drink and feed supply chains.

- Meat and Meat Products - criminality in the meat and meat products supply chain impacting on authenticity and traceability
- Animal By-Products - entry of illegal product into the food and animal feed chains.
- Alcohol - illicit and counterfeit alcohol in the supply chain
- Supply Chains of High Risk - fraudulent activity relating to supply chains of high risk

The Unit complies with the National Intelligence Model (NIM), which is a business process used by police forces and other law enforcement agencies to gather, evaluate and manage information and intelligence to deliver the control strategy, assess risk, allocate resources and guide operational decisions. Strategic and tactical tasking and coordination group (TTCG) meetings led by FSS further facilitate this process.

Horizon Scanning – Forecasting the Future

FSS undertakes horizon scanning and emerging risk analysis which provides support in identifying new, emerging and recurring risks and vulnerabilities in relation to food crime. The results are considered within the TTCG process.

Additionally, SFCIU is an active partner in government, law enforcement and industry multiagency groups, who all share intelligence to drive horizon scanning profiling. Horizon scanning activity is also undertaken jointly with the FSA's National Food Crime Unit, which has responsibility for England, Wales and Northern Ireland.

Internationally, SFCIU has established working relationships and processes with: EUROPOL, INTERPOL, the European Commission, EU member states and other countries to share intelligence and information which informs the global landscape in relation to threats and risks to the food chain.

Investigations

The SFCIU is currently involved in multiple live investigations in relation to all of the control strategy priorities. As a Specialist Reporting Agency and where there is sufficient evidence of criminality, SFCIU submits report directly to the Crown Office and Procurator Fiscal Service (COPFS).

Seizure under the Proceeds of Crime Act (2022) (POCA)

In July 2023, a conviction was secured in relation to a DNP investigation undertaken by SFCIU. DNP, or 2,4-Dinitrophenol, is an industrial chemical popular amongst

individuals wanting to lose weight rapidly, including bodybuilders and people with eating disorders.

In February 2025, an agreement was reached between COPFS and the accused's legal team that the benefit he had gained from his illegal activities amounted to £937,635 and the amount available to be seized was £31,050. A confiscation order was made to that effect which was in addition to a 3 year custodial sentence.

Case study

Potentially lethal counterfeit alcohol

Previously reported to Committee, as a result of intelligence received, the SFCIU recovered 231 bottles of counterfeit vodka containing isopropanol from convenience stores across the central belt of Scotland in August 2024. Isopropanol is potentially lethal to humans if consumed in sufficient quantities.

This is a long running investigation in partnership with local authorities and other law enforcement agencies. Support was also provided through Police Scotland's National MultiAgency Tasking and Delivery Board with a focus on the involvement of organised crime.

To mitigate risks to public health, a Community Impact Assessment was undertaken in parallel with the investigation. From the outset, a multi-disciplinary meeting was called by SFCIU, involving Public Health Scotland, NHS, National Poisons Information Service, Police Scotland, local authorities and the Scottish Ambulance Service, who initiated relevant actions within their agencies. FSS led the media response.

This swift, co-ordinated action substantially reduced the risk to the public, prevented deaths, and disrupted further sales.

A number of local authorities have reported alcohol licence holders to respective licensing boards where breaches of licensing conditions have been identified. To date, those considered to be in breach of conditions have had their licence revoked.

One individual has also been reported to COPFS for Culpable and Reckless Conduct for their part in selling the counterfeit product and the investigation is currently ongoing.

Case study – Fraud: Scottish Grown TeaFraudster convicted after selling fake Scottish grown tea

In 2018, in collaboration with a number of local authorities, SFCIU commenced an investigation into Thomas James Robinson, aka Tam O'Braan, of Amulree, Perthshire, selling tea he claimed had been grown at his own plantation and at 'single tea estates' around Scotland, and which he said had been processed on his premises. He also sold in excess of 22,000 tea plants to 12 unsuspecting growers across Scotland and a grower in Jersey, further claiming they were grown from seed/cuttings from his plantation in Scotland, all of which he knew to be untrue.

Robinson operated in plain sight, courting mainstream media from around the UK and Europe to promote the myth that he operated a successful commercial tea plantation, under the business name of 'The Wee Tea Plantation'. He falsely claimed to have university qualifications in agronomy and science, and that he was a tea expert, which enabled him to develop more effective methods of growing tea in a Scottish climate. He pretended to have received non-existent international tea awards and industry accolades to proclaim his branded products as being the best tea in the world. To further bolster his credentials, he falsely claimed to have served in the army and was a multi-millionaire. His strong media presence portrayed a man of integrity, expertise and reputation, which helped facilitate sales of his 'Scottish' tea as a premium product at greatly inflated prices to high-end hotels and retail establishments in Edinburgh, London and Paris.

Through extensive investigation, it was identified that Robinson had initially sourced a quantity of tea plants from a nursery in England, with which to establish a plantation at his home in Perthshire, thereafter ordering the vast majority of plants from a grower in Italy, at a fraction of the cost he charged to buyers. This also proved to be an elaborate part of his fraudulent scheme and offered credibility to his claims that he could source sufficient quantities of tea grown in Scotland to meet with customer demands. The truth was, he purchased quantities of world teas from wholesale suppliers in the south of England, which he simply repackaged, labelled and sold under the falsehood of being grown at plantations in Scotland.

Robinson defrauded consumers and businesses, who had bought 550kg of his fraudulent tea to the value of £278,634, and tea growers who had purchased plants from him to the value of £274,354.

During the investigation, SFCIU investigators interviewed 81 witnesses, noted 110 witness statements, and seized 446 evidential productions, which unravelled the various falsehoods Robinson had perpetrated in the setting up and operation of his fraudulent scheme. This included speaking to many of the journalists who had initially reported on Robinson's story as a successful entrepreneur.

Unique to this case, Aberdeen University undertook an ionomic study on samples of tea sold by Robinson, which greatly assisted the investigation in forensically

identifying that it was highly unlikely to have been grown in Scotland. Police Scotland supported the investigation in obtaining banking warrants to seize and examine Robinson's accounts, which provided supporting evidence identifying victims of his crimes and the illicit profits gained by him.

Between 6 and 29 May 2025, at Falkirk Sheriff Court, Robinson was subject to trial by jury and found guilty by unanimous verdict on two counts of fraud and was remanded in custody. He will also be subject to a hearing under the Proceeds of Crime Act 2002, with a view to seizing assets obtained through his criminal activity.

There are many victims of Robinson's fraudulent scheme. A number of people, duped by his convincing façade, had invested substantial personal savings to establish their own plantations in the hope that it would provide a substantial return, only to find it had been sold to them on false promises. There remains a number of legitimate growers of tea in Scotland, who are determined to establish a commercially viable enterprise over the fullness of time. By his actions, Robinson has tarnished a fledgling industry before it has had a chance to gain a foothold in this country and harmed the reputation of Scottish grown products.

On 25 June 2025, Robinson was sentenced at Stirling Sheriff Court to three and a half years in prison.

Crime Prevention Strategy

Prevention and enforcement are complementary approaches to tackle food crime. It is multifaceted and consistent with the Unit's remit. Delivery is per the food crime prevention strategy plan which is monitored throughout the TTCG process and community impact assessments bespoke to ongoing investigations.

A prevention activity of note was the launch of the online FSS Food Crime Risk Profiling Tool, which offers a free risk assessment to businesses to help identify and mitigate any vulnerabilities. To promote this FSS hosted a webinar on food crime prevention attended by 230 professionals across the food sector with expert guest speakers providing key inputs on reducing risk to businesses.

Multi agency and Partnership Working

SFCIU has developed links with stakeholders and partners to:

- Develop an enhanced intelligence picture
- Understand risk and vulnerabilities in the food, drink and animal feed supply chains
- Undertake joint enforcement, disruptive or preventative activity

- Undertake horizon scanning activity and identify emerging risks
- Ensure our food is safe and authentic
- Ensure responsible food businesses are enabled to thrive

Some recent and ongoing partnership activity with industry, law enforcement and regulators are also detailed below.

Industry

- SFCIU has developed a long standing relationship with Food Industry Intelligence Network (FIIN), an industry group of the largest UK food retailers, which has been beneficial for understanding food crime risks. Previous joint work has been an enabler for a necessary change in EU legislation.
- SFCIU maintains regular contact, including through established work groups, with various industry representative bodies, including Quality Meat Scotland (QMS), Safe and Local Suppliers Approval (SALSA), Red Tractor, Scottish Grocer's Federation, Scottish Food and Drink Federation, and the Scottish Whisky Association.

Law Enforcement and Regulators

- SFCIU are active members on a number of multi-agency working groups which allows for intelligence sharing and forensic support for ongoing investigations.
- SFCIU provides the intelligence support to Scottish local authority food teams and the Animal and Plant Health Agency in Scotland.

International Partners

- SFCIU is currently a lead agency for Operation OPSON, which is a EUROPOL and INTERPOL joint ongoing operation targeting fake and substandard food and beverages. In November 2024, SFCIU hosted the annual Operation OPSON meeting in Edinburgh which attracted representative from over 40 countries, industry stakeholders, Police Scotland, HMRC and UK Government agencies. The European Commission was represented by officials from the European Anti-Fraud Office (OLAF) and the Directorate-General for Health & Food Safety.
- A representative from OLAF attends the SFCIU Food Crime TTCG.
- SFCIU currently chairs the Global Alliance on Food Crime made up of membership from Australia, Canada, USA, UK and New Zealand. Members are working together on; coordinated operational and strategic initiatives, sharing intelligence with the aim of reducing the threat from food crime, reducing the vulnerability to industry and consumers and building domestic and global capability.

Future activities

Future activities will continue be intelligence-led and processed through the SFCIU Intelligence Bureau. Horizon scanning data will continue to be assessed by SFCIU analysts with a view to meet the challenges and demands of the future by anticipating emerging issues and presenting solutions for consideration in the TTG process.

1 The Cost of Food Crime Phase 2, Food Standards Agency, March 2023