



For safe food and
healthy eating

**Strategic Issue
Register:
Q1 2025/26**



Background



The Strategic Issue Register is designed to record and monitor issues impacting on the successful delivery of the FSS Strategy. The most important issues to FSS are those which will affect the delivery of the strategic objectives and key goals.

This approach aims to lay out a clear and direct line between the issues identified to strategy delivery and each of the goals and strategic objectives.

The FSS Strategic Issue Register exists to ensure that:

- Strategic issues are identified and managed.
 - Actions are determined, prioritised and action plans are implemented.
 - The effectiveness of existing actions are evaluated.
 - The Strategic Issue Register supports the FSS Strategic Plan.
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Strategic Issue: Key

STATUS KEY: Severity

Very High	Destructive and unacceptable impact on FSS/business operations that will result in a major change to overall approach. Large resource consequences.
High	Significant and unacceptable impact on FSS/business operations that will require material change to critical approach, procedure or process. Challenging resource implications.
Medium	Moderate impact on FSS/business operations that will require multiple changes in approach, procedure or process. Acceptable level of resource consequences
Low	Minor impact on FSS/business operations, will require little overall change in approach. Few resource consequences.

STATUS KEY: Actions

Completed	
On target	On target for completion
Ongoing	Delayed/delay anticipated but no negative impact on successful issue resolution
Ongoing	Delayed/delay anticipated with negative impact on successful issue resolution

STATUS KEY: Priority

Very High
High
Medium
Low
Very Low

Strategic Issue Trends

QUARTERLY ISSUE TRENDS

	2024-2025								2025-2026							
	Q1		Q2		Q3		Q4		Q1		Q2		Q3		Q4	
	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity
1. FSS Budget Allocation	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔						
2. LA Food Law Delivery Model	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔						
3 External Policy Pressures	High ↔	High ↔	High ↔	High ↔	Very High ↑	Very High ↑	Very High ↔	Very High ↔	Very High ↔	Very High ↔						



Strategic Issue No 1:

FSS BUDGET ALLOCATION

FSS budget allocation is no longer adequate to meet all its outcomes as detailed in the 5 year strategy.

FSS Budget Allocation

Issue No: 1	Executive Lead: G McEwan	Version: 2.0	Date issue raised: 24 August 22, by Geoff Ogle (FSS CEO) Date issue reviewed: Aug-25 Current status: ongoing
Issue Title	Issue Description		
FSS BUDGET ALLOCATION FSS budget allocation is no longer adequate to meet all its outcomes as detailed in the 5-year strategy.	Escalation history: FSS has been heavily impacted by leaving the EU and actual experience post-exit is bringing significant financial and staffing pressures on pre-existing and ongoing operational delivery. For financial year 2025/26 FSS identified in its recently published financial management plan an emerging budget gap of £2.5m. This was communicated to Scottish Government; however the budget allocation has remained the same as the previous year at £22.7m. This budget allocation will not allow FSS to fulfil all of it’s statutory and legal obligations.		
Strategic Objective(s)	Strategic Goals		
Insufficient revenue budget impacts upon FSS’s ability to delivery on all Strategic Objectives.	<ol style="list-style-type: none">1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit.2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken.3. A research and data science capability which enables us to detect risks, monitor public health trends and consumer behaviours, and translate evidence into action.4. A food environment which empowers consumers to make safe, healthy, and sustainable choices.		

FSS Budget Allocation

ISSUE 1		Priority	Very High	Severity	Very High	
CONTROLS IN PLACE						
Quarter 1						
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner
ALL	Scottish Government have recently published the new Public Service Reform Strategy which sets out the vision for all public services to go further and faster to deliver the services that people across Scotland need and deserve, and to improve lives. CSD are in the process of reviewing the strategy and preparing a high-level action plan for EMT to consider and progress.	10		2033	2028	G McEwan
	Having been successful in co-funding specialist posts FSS are now exploring opportunities to support other smaller delivery bodies by providing shared services. This may realise some further income generation.	80		Mar-24	Oct-25	FSS Managers
	FSS are in the process of drafting a new 5-year strategy which will be ambitious, realistic and supported by an integrated Finance, business and workforce planning methodology and process. The draft strategy is now out for public consultation and will conclude on 14 th September.	75		Q1 2026	Feb-26	G McEwan
	FSS are in the process of preparing the 5 year strategy supplemented by a 5 year finance management plan and people plan. These documents will outline the costs and importantly the risks associated with an under funded organisation. The plans once finalised will be presented to SG Finance colleagues as a rationale for increased budget to deliver statutory functions from financial year 2026 onwards. FSS are now in the process of supplementing this work by preparing the Future Resourcing requirement for financial year 2026/27. This will be presented to Government Officials mid September 2025.	60		Oct-25	Feb-26	G McEwan



Strategic Issue No 2:

LOCAL AUTHORITY FOOD LAW DELIVERY MODEL

Increasing pressures, including on finance and resource, for Local Authorities and FSS, has resulted in a delivery model which lacks the capacity, capability and competency needed to meet current and future challenges

Local Authority Food Law Delivery Model

Issue No: 2	Executive Lead: I McWatt / B Campbell	Version: 2.0	Date Issue raised: Oct-22 Date issue reviewed: Aug-25 Current status: ongoing
Issue Title		Issue Description	
Local Authority Food Law Delivery Model Increasing pressures, including on finance and resource, for Local Authorities and FSS has resulted in a delivery model which lacks the capacity, capability and competency needed to meet future challenges.		Escalation history: The Public Sector collectively has failed to invest in the training and supply of professional resource, mainly due to funding cuts, therefore Local Authorities are unable to deliver food law requirements as prescribed in the Food Law Code of practice. The demand for professionally qualified staff within Local Authority Environmental Health and Public Analyst Services, therefore, far outstrips supply risking the ability to meet statutory food law intervention requirements. The recommendation of the Strategic Risk Management forum is that risk 6 has effectively materialised and should be managed as an ongoing issue.	
Strategic Objective(s)		Strategic Goals	
Food is Safe and Authentic Responsible Food Businesses are Enabled to Thrive Consumers are empowered to make positive choices about food FSS is Trusted and Influential		1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit. 2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken 5. Be respected as an authority on food protection and public health nutrition, promoting change through impactful relationships within and beyond Scotland that enable us to influence, learn and collaborate.	

Local Authority Food Law Delivery Model

ISSUE 2		Priority	Very High	Severity	Very High		
CONTROLS IN PLACE							
Quarter 1							
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner	
1,3,5	<p>The continued deterioration of LA capacity and capability in delivering food law interventions has resulted in a programme of reform (known as SAFER) to review the existing delivery model for food law, including the scope for charging, third party assurance and use of digital and data. Funding for 2025/26 has been provided through the SG Invest to Save Fund (ISF) and success of the programme is incumbent on the future funding for 2026/27 and 2027/28.</p> <p>Local Authority Delivery Division is progressing several projects during 2025/26 to support Local Authorities in delivery of food law during the SAFER Programme.</p> <p>These include:</p> <ul style="list-style-type: none">● Project to review Qualifications and Competencies for Food Law Authorised Officers, incorporating alternate routes to qualification and a competency framework that allows tiers of authorisation across all business risk profiles.● Review of the Food Law rating System intervention frequencies using evidence from the FLRS review published in 2024● Approved establishment Project intended to address issues raised during audit and to improve consistency of LA approach. It will include review of existing protocols and Code of Practice for Approved establishments● Review of current 2019 Food Law Code of Practice to update and provide standard setting direction to Local Authorities●As part of business as usual continue with Local Authority resilience and support through quarterly discussions with Lead Food Officers to understand local pressures and performance	5		2025/26	2028/29	B Campbell L Murray	



Strategic Issue No 3:

EXTERNAL POLICY PRESSURES

External Policy Pressures

Issue No: 3	Executive Lead: Garry Mournian	Version: 1.0	Date issue raised: 12 February 2024 Date issue reviewed: Aug-25 Current status: Ongoing
Issue Title	Issue Description		
EXTERNAL POLICY PRESSURES	<p>The legacy of the UK Government’s post-EU Exit deregulatory statute book will continue to impact FSS. The policy and regulatory environment is now significantly more complex due to the interaction of the UK Internal Market Act, UK Common Frameworks, and the Retained EU Law Act. The UK and EU have also committed to working towards a new Sanitary and Phytosanitary (SPS) Agreement based on dynamic alignment with EU rules, [redacted]. FSS’s ability to remain fully engaged across UKG led policy initiatives within existing resource constraints will remain challenging, with consequent risks around GB/UK divergence, impact on delivery of core statutory obligations, and staff wellbeing, particularly as work on a new UK-EU SPS Agreement increases.</p> <p>Escalation history: The recommendation of the Strategic Risk Management Forum is that risk 8 should be managed as an ongoing issue.</p>		
Strategic Outcome(s)	Strategic Goals		
<p>Food is Safe and Authentic</p> <p>Responsible Food Businesses are Enabled to Thrive</p> <p>Consumers are empowered to make positive choices about food</p> <p>FSS is Trusted and Influential</p>	<ol style="list-style-type: none">1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit.2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken.4. A food environment which empowers consumers to make safe, healthy, and sustainable choices.5. Be respected as an authority on food protection and public health nutrition, promoting change through impactful relationships within and beyond Scotland that enable us to influence, learn and collaborate.6. Engage with all parts of society in Scotland; understanding the issues that matter to consumers and providing information that is tailored to their needs.		

External Policy Pressures

ISSUE 1		Priority	Very High	Severity	Very High		
CONTROLS IN PLACE							
Quarter 1							
Goal	Actions	% Complete	Status	Original Completion Date	Revised Completion Date	Action Owner	
ALL	Continue to make the case to Scottish Ministers that delivery of FSS’s post-EU Exit policy and statutory responsibilities and ability to influence cross-UK policy making for the benefit of Scottish consumers and food businesses will be constrained within the current budget settlement. This is now being picked up through the budget discussions and calculations being led by Ian McWatt, which will not only factor in post EU Exit work, but the impact any negotiated SPS Agreement has across the breadth of FSS’ remit.	40		Ongoing		I McWatt/G Ogle	
	Ensure appropriate FSS engagement and coordination with SG, relevant UKG departments, and the FSA as part of readiness preparations for formal UK-EU SPS negotiations [redacted].	25		TBC		G Mournian	
	Continue to remind policy leads in FSA, Defra, DHSC of UK common framework obligations as part of the policy development process and work across teams to publicise framework commitments once they move from provisional to final agreement. This includes leading on the development of joint operational FSA/FSS guidance on framework delivery, which will be prioritised again once the frameworks themselves have been formally signed off. Updated to AMBER as this work will be impacted by SPS – however it’s likely frameworks will become the basis of GB discussion when feeding into EU matters.	70		Ongoing	ON HOLD	G Mournian	
	Undertake an assessment on the impact of the UK Government’s Genetic Technology (Precision Breeding) Act 2023, and EU New Genomic Techniques (NGT) proposals, and implications for Scotland, with a view to making recommendations to the FSS Board in 2025. This is unlikely to progress as outlined in terms of Board discussions as PB is within scope of the SPS negotiations.	50		Apr-25	ON HOLD	G Mournian	
	Prioritise collaborative working with Defra and SG on any proposed food labelling changes, including participation in a Defra led GB-wide consultation on animal welfare and country of origin labelling. The consultation has now closed and no proactive work is required. Labelling is also within scope of an SPS agreement and therefore it’s unlikely and changes will be forthcoming during the negotiation phase (and beyond).	80		Ongoing	ON HOLD	G Mournian	