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RESPONSE TO THE FARMING REGULATION TASK FORCE REPORT Striking a balance: reducing burdens; increasing responsibility; earning recognition.

The Food Standards Agency (FSA) was established in April 2000 as a non-Ministerial UK Government Department, operating at arm's length from Ministers, headed by a Chair and Board, who are appointed to act in the public interest. The FSA is responsible for assessing and managing risk in relation to food and communicating advice to the public. We are guided by a set of core principles:

- putting the consumer first;
- openness and transparency;
- science and evidence-based;
- acting independently;
- enforcing food law fairly.

The FSA acknowledges the importance of the Task Force Report and the serious consideration it deserves. The Task Force Report builds on the Hampton report and principles of good regulation: proportionality, accountability, consistency, transparency, and targeting. The FSA wholeheartedly supports these and we continually strive to demonstrate them in our work.

The FSA Board considered the Task Force Report at its meeting in July 2011. It agreed with the majority of the recommendations that fall within our remit. All have been previously explored in depth by the FSA and are implemented, under development or being given further consideration. More detail is in the attached table.

The Board however rejected for now the recommendation to set up a group to consider the criteria for accepting provision of meat inspection services by third

parties. The Board considered this further at their meeting in September and agreed to invite industry to take the lead in demonstrating to the Board the feasibility of any alternatives to the current delivery model, with the FSA providing support and advice as appropriate.

Aside from the specific recommendations relevant to the FSA, we also wish to make the following more general comments on the Task Force Report:

- Protecting the public's health and consumer interest in relation to food is the touchstone of our response to the report. We recognise the importance of reducing burdens on business but we also consider that any actions taking place in response to the Task Force recommendations must aim to maintain and improve consumer confidence in food.
- An important factor in maintaining and improving consumer confidence in food is the use of a transparent and sound evidence base and the testing of any assertions or conclusions. It was sometimes a little difficult to discern the strength of the evidence underlying the Task Force recommendations.
- We recognise that the Task Force report covers England only. The FSA is a UK wide body. As such it is important that in deciding to commit resources and in developing policy that we consider the implications in each of the four countries of the UK. Any potential for divergence of policy needs to be considered very carefully, not least for the potential impact on businesses that trade across our national borders. For this reason we have included in the table of responses an indication of the current policy position in Scotland, Wales and Northern Ireland.
- As noted by the Task Force, several of the recommendations could be implemented only following changes to European legislation. The UK can present the strongest case when Government, industry and consumer organisations all work together in partnership to effect change.
- The Report focuses on Government trusting industry. We would also emphasise the importance of consumer trust and confidence. The FSA was set up to protect consumers' interests and to build consumer trust. Consumer trust is important to delivery of our own work, but it is also important for industry. Only by maintaining and building consumer trust and confidence can industry grow and protect its markets, both in the UK and internationally. We believe, therefore, that the central thesis of the Task Force, that of trust, responsibility and partnership, should extend to also include consumers.
- The Task Force Report states that, 'Government must trust industry, must involve it in the development of non-regulatory and regulatory solutions, and must set the framework for industry to take responsibility'. Coupled to this is

the encouragement of the development of earned recognition systems. These are all issues that the FSA has itself been addressing. While we would agree with the general direction of travel, indeed as the Task Force recognises, we have already made significant progress in relation to earned recognition. We emphasise that all change must be based on robust evidence and we must ensure that any action will not compromise consumer safety.

To conclude, as is made clear in the attached table, the FSA supports the majority of the Task Force recommendations that fall within its remit. We will continue to work in partnership with industry, consumers and other stakeholders to implement changes that are beneficial to industry, so long as those changes can be effected without compromising consumer protection.

A handwritten signature in black ink, appearing to read 'Jeff Rooker', written in a cursive style.

JEFF ROOKER