

Environment, Food and Rural Affairs Committee

Oral evidence: Animal and Plant Health, HC 611

Tuesday 21 October 2025

Ordered by the House of Commons to be published on 21 October 2025.

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Members present: Alistair Carmichael (Chair); Sarah Bool; Charlie Dewhurst; Sarah Dyke; Jayne Kirkham; Josh Newbury; Tim Roca; Henry Tufnell.

Scottish Affairs Committee member also present: Susan Murray.

Health and Social Care Committee member also present: Ben Coleman.

Questions 360 - 450

Witnesses

I: Katie Pettifer, Chief Executive, Food Standards Agency (FSA); Geoff Ogle, Chief Executive, Food Standards Scotland (FSS).

Examination of witnesses

Witnesses: Katie Pettifer and Geoff Ogle.

Chair: Good morning and welcome to this meeting of the Environment, Food and Rural Affairs Select Committee. The Committee returns to its inquiry into animal and plant health this morning, and we are delighted to be joined by colleagues from the Food Standards Agency and Food Standards Scotland. Katie and Geoff, you are very welcome to the Committee. We are grateful to you for your attendance and engagement. For the benefit of those who are following our proceedings and for our own official record, can I invite you to introduce yourselves and explain your roles?

Katie Pettifer: I am Katie Pettifer. I am the chief executive of the Food Standards Agency, which works across England, Wales and Northern Ireland.

Geoff Ogle: Hi. I am Geoff Ogle. I am the chief executive for Food Standards Scotland, which is a similar role to Katie's dealing with food and feed safety, but we also have responsibility for improving dietary health in Scotland.

Q360 **Chair:** The genesis of this was a visit that the Committee undertook to the John Innes institute in Norwich, looking at its work in precision breeding, since which time we have also spent time in Brussels, talking to the different institutions and parties there in relation to the possible SPS agreement with the European Union, both aspects that will have a fairly direct bearing on your work. We are grateful to you for your attendance, and we have other areas that we will want to turn to as well.

Katie, the FSA has a very broad remit, covering public health, agricultural, environmental and disease control aspects of food standards. Talk me through how this works in terms of your engagement across the different Government Departments and ensuring that your voice in all these things is heard in the formation of Government policy.

Katie Pettifer: We are a statutory body and, as you just mentioned, our statutory objectives are to protect public health and to protect the interests of consumers in relation to food. Those are the ones set up in our governing legislation. We have a set of specific regulatory functions across England, Wales and Northern Ireland that are primarily about making sure that food is safe and is what it says it is.

We also have other functions. We advise consumers and, really importantly, we have a statutory function of advising Ministers. We are the lead Government Department with policy responsibility for food safety in each of the Governments that we serve. So when we advise Ministers, we are performing a statutory function. Our independent board, which is appointed by Ministers in all three countries, makes its decisions in public, transparently, which we think is really important for consumer confidence and maintaining that independence.



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In terms of our relationships with Government, first it is worth saying that we are really quite unusual, in that food is devolved and we work across three countries. We advise three different Governments and we work really hard, jointly with Geoff and his team, to work on a four-country basis wherever we can through our common frameworks.

In the UK Government, our sponsor Department is the Department of Health and Social Care, because we are a public health body. So it is Health Ministers who we are usually advising and who are responsible for our governing legislation, and we have a good relationship with them. We also have as much contact with DEFRA, because often we are collaborating on issues that are DEFRA's responsibility.

We were deliberately set up to be sponsored by Health rather than DEFRA, to keep us separate from the Department that has the food sector responsibility, but our chair meets Ministers from both Departments on a regular basis. In fact, she is meeting both this week. We also work very closely with DBT and DSIT on various areas within our responsibilities that we will probably touch on.

Our chair also meets Ministers in the devolved Governments. I think that she is also meeting Sarah Murphy in Wales this week. We have regular, frequent contact.

Q361 Chair: Geoff, you have got it easy. You just report to the Scottish Government, albeit across, I think, a couple of ministerial areas. Katie, I have it written down here, just so I get this right—you are sponsored by DHSC in England, but, as you say, you have cross-departmental responsibility with DEFRA. You are accountable to the Welsh Assembly Government and the Northern Ireland Executive in Northern Ireland. You are responsible for food and feed safety and hygiene in all, and food safety and allergen labelling.

In Wales and Northern Ireland, you are also responsible for other food labelling, for example on country of origin, but in England that is in DEFRA's remit. In Northern Ireland, you are additionally responsible for nutrition standards and nutrition labelling, but these are under the remit of DHSC and Welsh Assembly in England and Wales. In terms of Northern Ireland, your work is not actually done by the FSA, but with a service level agreement with the Northern Ireland Government. Is that correct?

Katie Pettifer: Some of our functions in Northern Ireland are carried out by DAERA on our behalf. We have service level agreements also with DEFRA and others. We try to work in the most efficient way across the system, so there is a lot of joining up.

Q362 Chair: The general impression I have of you—if necessary, we will revisit this at the end of the session—is that you are a good and effective agency here. Does this accountability landscape help or hinder you?



Katie Pettifer: There are always going to be join-ups in Government. It is a complicated picture, generally. I have a diagram, if it is helpful for the Committee, that I could share.

Q363 **Chair:** I have one of them as well. It just does not work for description.

Katie Pettifer: Our cross-UK remit, together with Geoff, can be a real asset, because we can often play a role in really helping to join things up across the UK. When you think about it from the perspective of consumers and businesses, generally divergence can be confusing and costly, so we have a real asset to bring to bear there. As I said, we work together through common frameworks. We put a huge amount of effort into our four-country working and three-country working, and I am really proud that we make it work well.

Q364 **Chair:** In terms of the work you do, you are an executive agency in the sense of actually performing functions, but you have responsibility in some fairly significant policy areas in relation to the food system, the strategic oversight of that, sustainability and food security. How much of that is meaningful work for you, or how much of it should sit on the desk of Ministers?

Katie Pettifer: The policy responsibilities we have, as I say, are primarily in food safety, but as you have just set out, they differ across the nations. Where we are doing a policy role, we are generally then advising Government. We are setting out publicly what we think the policy should be. We are providing advice, but ultimately, it is Ministers who decide whether they are going to bring changes to the law to Parliament, not us. Where we are carrying out a regulatory role, we are getting on and carrying out our functions and decision making ourselves.

Q365 **Chair:** You have, in the FSA strategy for 2022 to 2027, a goal that food is "healthier and more sustainable". I am not sure that anybody would ever advocate for the opposite of that. Give me a concrete example of what you do that makes the sourcing of food more sustainable.

Katie Pettifer: It was a very deliberate choice to include that in our strategy and it was the subject of a lot of discussion with our board, because our core job is primarily around the first two bits of our strategy—food being safe and food being what it says it is. We wanted to recognise that although we do not have the lead—we are not responsible for policy on food sustainability and nutrition in most of the areas we work in—there are things that we can do within our remit that help, and we wanted to signal very clearly that we wanted to support on those areas.

For example, we have done a pilot with the Department for Education a couple of years ago to look at how the school food standards on healthy food in schools could be enforced, working with local authorities. We have been very involved with DEFRA and DHSC in their food data transparency partnership, bringing our food data background to bear on that. We are



looking for things that are relevant to our functions and where having a regulator involved can help.

- Q366 **Chair:** Geoff, you have some of this as well. You have a sustainability plan from 2022 and that commits you to include specific environmental sustainability considerations in policy decision-making frameworks and templates. I think I know what that means, but can you give me a concrete example of how it actually comes out in terms of outcomes?

Geoff Ogle: I am not sure whether I have a precise example off the top of my head. We might come on to this later. For us, the sustainability is a much broader concept than just the climate aspects. I suppose an example where we have had to balance sustainability and public health most recently is our analysis of the Climate Change Committee report on reductions in red meat consumption. Our conclusion was that, given the status of the diet in Scotland, the dietary risks in moving towards the climate change recommendations potentially created a public health risk rather than reducing a public health risk. Our advice at that point was that we needed to aim to hit the dietary goals that currently exist, and that would actually go a long way to improving the sustainability goals that the Climate Change Committee recommended.

There is a tension sometimes between the sustainability requirements and the food safety issues, for example the use of CO₂ to enhance durability. You could say, "Let us reduce the CO₂," but then you reduce the durability of the food and that increases waste. There is a constant tension between the sustainability challenges on the one hand and the food safety and public health issues on the other.

- Q367 **Chair:** Can I come back to you, Katie, and look at this question of the relationship between you and the Department of Health and Social Care as your sponsoring Department? It is fair to say that, the last time this Committee went round the course on this, the then chair was somewhat lukewarm in her praise of the Department of Health at that point, but actually quite fulsome in relation to the engagement with DEFRA. How are things now?

Katie Pettifer: They are better, I think. This is something that my chair is best placed to give a view on, but I know that she thinks the relationship has significantly improved and has very good relationships with both Departments. There was a period where we felt we were getting much more contact from DEFRA because the areas we were working on were more of their interest. To be honest, in the great scheme of things for the Department of Health, food safety tends not to be at the top of the agenda, but we have actually had very productive relationships with the lead Minister in the Department of Health and with officials. I can elaborate on that, if you would like, in more detail.

- Q368 **Chair:** You said that you were put with Health because it would be too cosy to have you with DEFRA. If there is now a greater focus on health-related issues, does that still hold?



Katie Pettifer: We are 25 years old this year, because we were set up in the wake of BSE. That origin story explains why we were put with the Department of Health. It is still really important that we regard ourselves as a public health body and that it is clear that we are here, first and foremost, to protect public health and consumers. Particularly as we do more and more work on how regulation can support growth and businesses, we are very cognisant of those issues. For us, being with the Department of Health is quite symbolic. Ultimately, it is up to Government where they want responsibilities to sit, but it is a very core part of our identity.

Geoff Ogle: It is worth noting as well that if you look at the consequences in terms of healthcare costs from the volume of foodborne illness, for example, that is hundreds of millions, if not over £1 billion, I think. The consequences, in terms of when things go wrong in the food system, directly impact on the health system.

Chair: It was remiss of me not to have welcomed two colleagues from other committees. We have Ben Coleman from the Health and Social Care Committee and Susan Murray from the Scottish Affairs Committee. Ben, you wanted to come in on this issue.

Q369 **Ben Coleman:** The food strategy, which you worked upon, is of a huge amount of interest to the Health and Social Care Committee because of the aspects of the public health. How content are you that the food strategy really will improve public health significantly—or do you think that that is very much an add-on?

Geoff Ogle: The food strategy, in terms of its direction of travel, is very promising. In terms of a bit of context, the diet-related costs to the NHS in Scotland are about £776 million. The economic costs are about £5.3 billion. We have said fairly constantly as an organisation that the food environment is the problem and needs to be addressed. The strategy, where it is balancing economic growth and health, is really important. The concern is that we make sure that there is a retention on the health focus.

In terms of the proposals around mandatory reporting and increasing that transparency and visibility of the food production, that is something that we could welcome. In general terms, the food strategy is generally directed in England, but there clearly are areas of the levers that are reserved, such as the sugar levy. We think that it is heading in the right direction. As long as we maintain the balance with health, we think that it is a good opportunity.

Katie Pettifer: We have been working very closely with DEFRA on the food strategy and with DHSC on those aspects of it. We most definitely welcome the Government's announcement on mandatory reporting for big food businesses, which could be really significant, as Geoff says. With our Northern Ireland hat on, there is a real case for trying to join up as much as we can across the UK there.



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We have been working informally with the Department of Health to help give it views from a regulator's perspective, as it thinks about how to do this, about how you might do it and enforce it. As part of our finding areas, we can help. We are also very pleased, in the food strategy document that DEFRA published this year, to see it recognise the importance of safe food and food safety within that. The development of that is an ongoing process. That document with DEFRA is not the be-all and end-all and we will keep working really closely with DEFRA as it goes on with it.

Q370 Chair: Do you think there is a bigger role for you in terms of the delivery of that strategy? People such as Dimpleby and some of the House of Lords Committees have suggested that there could be.

Katie Pettifer: There are a whole host of things that the Government could choose to do that involve regulation. If they do, they may need a regulator. That is up to Ministers to decide. Obviously we are sitting here as a food system regulator, and if we can help on the thinking, we will.

Chair: You stand ready to serve.

Q371 Tim Roca: Chair, can I ask a quick question? It was your questions about governance at the beginning that piqued my interest. Am I right in saying that the FSA is responsible or accountable to Ministers? Is the FSS responsible to the Scottish Parliament as a non-ministerial agency?

Katie Pettifer: I am accountable to my board. The board in law is the FSA. We have a statutory role of advising Ministers. They can choose whether they take that or not. We are accountable to Parliament. We get our funding directly from the Treasury. Ministers in the Department of Health are responsible for our governing legislation and appoint our board.

Q372 Tim Roca: What is the situation in Scotland?

Geoff Ogle: It is actually very similar. We are directly accountable to the Scottish Parliament, but again, we provide advice to Ministers. They can request advice from us. As Katie says, they can accept it or not, so it is a similar structure. In terms of not a line of accountability but a line of liaison, if you like, that is into the Public Health Minister for me.

Katie Pettifer: I should have said, when I said that Ministers in the Department of Health appoint our board, that they appoint most of our board and then Ministers in Wales and Northern Ireland also appoint some members.

Q373 Jayne Kirkham: I wanted to ask about your changing relationship with the EU. Since we left the EU, you have taken on a number of other responsibilities and roles and have been assisting with some of the risk assessments for free trade agreements as well. How successfully do you feel you have been able to take on these new roles. Do you have the resources to do so? What challenges still remain?



Katie Pettifer: We have taken on several new functions since we left the EU. Probably the biggest and most significant is the processing of market authorisation requests—particular types of food and feed that need a pre-market authorisation before they can lawfully be sold in GB. Northern Ireland continues to follow the EU decisions on that. That has been a really significant part of our work. We have staffed up a new team on it, which involved taking on a lot of new risk assessors, policy people and so on.

Q374 **Jayne Kirkham:** How many people, roughly, do you think you have had to take on to deal with that?

Katie Pettifer: We got several million-worth of funding for new functions originally in the spending review, which was significantly less than we had asked for. It is tens of people in total, but probably nearer the upper end of that. I don't have an exact figure in front of me. I would be happy to send one if you like, but I think it is in the region of 80 people.

We also, within that, have taken on market access requests and advising on those and various other trade-related roles. The market authorisations regime that we inherited from the EU is 14 different regimes. In the EU, it takes several years to authorise a product. We have been steadily working to modernise that since we took it on and to streamline it. We have taken forward, or Ministers have on our behalf, legislation to make a first wave of changes to make it quicker to make the authorisations, not reducing any of the safety checks but simply process-wise. It used to take an individual statutory instrument for each product, for example. We have more reforms in train.

Geoff Ogle: On your resource point, there is clearly a resource implication for us in terms of the initial work that will need to be done, subject to where the agreement lands, in terms of what dynamic alignment looks like. The concern I have is not so much dealing with the peak of work; it is what the resource requirement is in the longer term, because the EU law will not be directly applicable and we will have to replicate it. There is also, under the common agreement, the ability to be involved in policy development and all that sort of stuff. There will be an ongoing requirement in terms of maintaining dynamic alignment, which will require an ongoing resource. We are doing some work to identify what that resource requirement will be.

Q375 **Jayne Kirkham:** There is a lot to do. Someone else will ask you about that. We are thinking that there might be an agreement in 2027, so there is a lot to do quite quickly. I was going to ask before that about your current relationship with EU counterparts, such as the European Food Safety Authority. Has that changed over time? Where do you feel you are now with it?

Katie Pettifer: I think it is fair to say that, since we left the EU, there has been relatively little formal engagement with the EU institutions at a senior level, but we still have a lot of technical engagement. Our teams



were over, presenting our risk assessments on glycerol and the reforms I have just talked about at a committee under the TCA. We engage with the EU in other fora. We are a member of the strategic food safety dialogue, of which the EU is also a member. There is a way to go on formal engagement and I am hoping that we can build on that.

It is worth saying that we also have really constructive bilateral relationships with a lot of the EU member states. My chair has been meeting counterparts in quite a few countries. Geoff and I had our counterparts over for a visit two or three weeks ago now. We had regulators from Netherlands, Ireland, Germany, France and Belgium over. We all went to London Gateway port. We talked about how we collaborate on borders. We have a lot of good relationships to build on.

Q376 Jayne Kirkham: We have lost access to some of the digital systems the EU had, such as the rapid alert system for food and feed. That has obviously created challenges for you. Could you explain to us what those are and how you have managed to address them?

Katie Pettifer: We now only have third-country access to RASFF, which is less real-time. We still get the alerts, but only the ones that relate to us.

Q377 Jayne Kirkham: You do not know, I suppose, whether anything in the future will relate to us, so you could miss out.

Katie Pettifer: Exactly, so we don't see what is happening across the whole picture and we cannot upload our own alerts. That has been a challenge for us.

In response, we have done an awful lot to build up other sources of information on food risks. We have done some work with AI tools, which scan and scrape information from websites around the world on food risk and categorise it and produce signals dashboards for us. We have really strengthened our relationship with INFOSAN. We do a lot of work through INFOSAN, who facilitates co-operation between regulators around the world on this, not just with the EU. We feel like we have put in place a good system following loss of full access to RASFF, but obviously regaining it would be really helpful.

Q378 Jayne Kirkham: Yes, so you have obviously expended resource on doing that as well.

Geoff Ogle: Where we have shifted, though, is the forward look. RASFF, to some extent, is a reactive system. A problem is identified, then you are notified of the problem and everybody reacts to the problem. Over the last few years we have shifted to trying to anticipate a bit more, if you like, in a more logical, scientific way, around where the risks might be presenting themselves.

A good example is climatic change. For example, a failed harvest can potentially cause problems. New Zealand had a really big tornado that



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decimated a lot of its wine production. There are ways in which we can start to predict where some of the risks in the system might be. We are more developed now in that area than we were a few years ago.

Chair: We are moving on now, quite logically, to the possibility of a future SPS agreement with the European Union.

Q379 **Sarah Bool:** I wanted to explore your point a little bit further, Geoff, about being prepared for the implementation of this SPS agreement with the EU. We have just been, as was mentioned, out meeting various different counterparts, and there is definitely ambition to have a mandate agreed by the end of this year and to try to get this in place by 2027. To what extent do you feel that you are prepared and resourced for implementing an SPS agreement?

Geoff Ogle: In general terms, the broad framework of food law that applies is still the law that applied when we left. It has just been assimilated over. In broad terms, the broad structure is fairly similar. Having said that, there are still a lot of technical changes that have happened since we have left, and lots of real detail in legislation.

Our estimate is that, of the Scottish statutory instruments that we have identified, about half of those are relevant to us that we will have to review. We are anticipating an additional 15 to 20 staff to deal with that particular peak in terms of resourcing, so we are looking at what we can do internally around that, but we will also probably have to look a bit further in terms of what other resource we can get. We are in discussion with the Scottish Government around that.

We know from all the work we did in terms of leaving the EU that there is no easy way other than to actually go through all the SIs, look at the technical changes that have been made and then see what has to be done to rectify that position in terms of dynamic alignment. It is quite a technical, laborious, long process which you cannot really avoid. For us, it is a strategic priority going forward. It cannot be anything other than a strategic priority for us.

Q380 **Tim Roca:** Sarah, could I pick up on the budget issue? Geoff, before coming here I was looking—you have had a flat budget settlement this year, a flat budget settlement from the Scottish Government the year before and a flat budget settlement the year before that and the year before that. Are you into your fourth year of flat cash from Holyrood?

Geoff Ogle: I think that it is more than four years, actually. We had a £7 million injection because of Brexit although, similar to Katie, that turned out not to be sufficient. Other than that, we have been pretty much flatlined since we started.

Q381 **Tim Roca:** In a remarkable policy environment that is changing all the time, you are facing real-terms cuts.

Geoff Ogle: Yes.



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Katie Pettifer: To build on that, we are also in a flat budget settlement for the spending review, so we have not been given any extra money to do the SPS agreement. On the question whether we will be prepared or are prepared, we will make it work, because the most important thing is to deliver an agreement that protects consumers in the UK and protects public health for us. Delivering the agreement well is one of the biggest things that we can help do to promote growth in the UK.

I am having to surge people to work on it without any change in the day job, and without any extra resource, so it means that we are having to make some decisions about prioritisation. That is a challenge for us. We own about 80 of the pieces of legislation that would be in scope for alignment, I think, of probably about 300.

Q382 **Sarah Bool:** How much is it affecting your future look at the moment? For example, are you delaying the market authorisation of novel foods in anticipation or just carrying on business as normal?

Katie Pettifer: We have a job to do, and we need to keep doing it. We have statutory functions we have to deliver. It is affecting us in a couple of ways. First, as I said, we will have less resource available to work on the other areas. On the market authorisations regime, there are a couple of areas where we have ringfenced resource from Government on innovative new foods—on cell-cultivated products, for example, and precision fermentation, which are ringfenced and unaffected, but it may mean we have less resource to do the rest of the processing.

Secondly, as we get closer to an agreement, there will be more and more things where we may say, "It is no longer worth doing this." I mentioned that we have been reforming the market authorisation regime. We brought a second wave of reform to our board in June, after the common understanding had been published by the UK and the EU. At that stage, the board decided not to proceed with consultation on those reforms, because, by the time we got them in, it would potentially have been superseded by an SPS agreement. I think there will be more of those areas. We are not going to consciously create divergence unless it is necessary for food safety or there is a real case for it otherwise.

Q383 **Tim Roca:** There has been a degree of divergence since we left the European Union, particularly around inputs, feed additives, pesticide residues and toxin levels in food and animal feed. What do you both anticipate some of the challenges will be as we realign UK regulations?

Katie Pettifer: Implementation for business is going to be a big challenge that we will need to manage collectively with the industry. Together with DEFRA, we are definitely gearing up to do that. As you say, there have been areas where we have actively diverged. Precision breeding is a good example. I am sure that we will talk about it. There have been areas where we have passively diverged, because the EU has made decisions about additives like titanium dioxide or smoke flavourings that we have not followed.



Businesses will need time to reformulate—to phase out—if they are going to have to realign. Obviously, the ones that are exporting to the EU may well have done that already, but there will be businesses that don't. Until an agreement is actually negotiated, I don't think we can be certain exactly what will align. But as the shape of an agreement becomes clear, it will be really important for us and DEFRA to work with the industry to understand that transition timeline.

Q384 Tim Roca: You have good collaboration with industry on these points. There are concerns about the new EU thresholds around mycotoxin contamination levels, particularly with regard to oat producers. I have oat producers in my county, Cheshire. I know that in Scotland it is a big issue as well. What were the findings from your joint call for data on UK exposure to these mycotoxins in 2023? Is there an intention to update guidance?

Geoff Ogle: The risk around mycotoxins is generally a known issue. Certainly from a Scottish perspective, there are particular climatic conditions to do with the weather. It can be a bit wet, windy and damp, which increases the risk. We are in the process of doing a revision to the risk assessment, and that will need to be looked at by the Committee on Toxicity. We are expecting something back from it in early 2026.

Once the risk assessment is done, we can then move into the risk management implications in terms of what that might mean in terms of advice and where we go. Until we have the revision to the risk assessment, it is difficult to say what our response will be.

Q385 Tim Roca: I am just trying to think. We will not automatically be realigning with the EU thresholds on this. It depends on that risk assessment.

Geoff Ogle: It will depend on what happens in the negotiations. The Government have made clear that there will be some areas of policy that they would look to negotiate in terms of exemptions. I don't know at this stage exactly what they will be looking to negotiate. I suppose it is possible that mycotoxins might be one of those, but I cannot say whether they will be.

Q386 Tim Roca: The public will expect standards to be as high as possible, and that should surely be one of the exemptions. Labelling did not really appear in the food strategy last year. We have diverged quite a bit on labelling policy. It is really important for the public to know where their food is from and how it is produced. You talked a little bit about that at the beginning. Also, animal welfare is really important to many of my constituents and others' around here. Can I talk about what the implications of the SPS deal could be on labelling reforms as we progress?

Geoff Ogle: At the moment, we don't know what will be in or out of scope with the SPS agreement and labelling. Labelling is classed as a technical barrier to trade. It comes under the general consumer



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protection rules, so we will have to see where we land in terms of the agreement around what the implications are for labelling. There is still the opportunity for voluntary labelling, but there are potential issues and concerns that industry might have around that, for example in terms of cost.

It is similar to the point that Katie made. The impact may be variable depending whether you are an exporter or not. If you are exporting to the EU, you have to meet EU labelling requirements now anyway. It will be a variable impact depending on the type of business you are. Without seeing the detail of the agreement, it is hard at this stage to say what the impact would be.

Q387 Tim Roca: It is interesting, because that is two or three times now, quite understandably, that you have said that we do not know the details of the agreement yet, but we are talking about it coming in in early 2027, which is round the corner, frankly, in policy terms. Are you worried that the timescales are too ambitious?

Katie Pettifer: It is a challenging timescale. I think Nick Thomas-Symonds said that they want to conclude negotiations and have the legislative arrangements in place in 2027. There is clearly a conversation about transition implications for the industry that needs to happen. Whenever I talk to businesses to trade bodies, they want us to get on with it, and to get on with it quickly, because they can see the benefits, so that is what we need to do.

Q388 Chair: Once we know what "it" is.

Katie Pettifer: Yes, that is going to be the challenge.

Q389 Chair: Geoff gave us a figure there of 15 to 20 staff, presumably for FSS, in relation to the implementation of an SPS agreement. Katie, are you able to give us a similar figure for FSA?

Katie Pettifer: We have said that it will take potentially around 80 staff in our estimates for next year. I have probably 60 to 70 people working on SPS at the moment, in all or in part.

Q390 Chair: The consequence of prioritisation means that there would be other areas that would be deprioritised. When we were out in Brussels last week, we picked up some concern about the implementation of BTOM, for example. If we do not go ahead with BTOM, that is fine as long as we get an SPS agreement. It sounds like you are already identifying other areas like that, where you say, "We are not going to do that." If we do not get the SPS agreement, where does that leave you? Is there a risk that the approach you are taking could have a weakening effect on our negotiating position in that SPS agreement?

Katie Pettifer: The decision on whether to proceed with full implementation of BTOM is very much one for Government Ministers and DEFRA. It is not something that we have decided on and actually is not



something that makes a big difference to us, resource-wise. On the areas where we have been deprioritising, I have mentioned the reform to the market authorisation service, for example. If the SPS agreement were not to go ahead, I am sure that we would want to return to that and pursue it, but it would be happening later. There are other areas of our reform work where we would just have less bandwidth, particularly in the local authority delivery space, unless we get further resource for the SPS.

Q391 Chair: It is very much in your interests, and the UK interests as a whole, that we have an early agreement and implement it quickly, and hopefully these things that we have taken on a wing and a prayer do not become problems.

Geoff Ogle: Yes. The regulatory underpinning is really critical. The ability to trade depends on the regulatory underpinning to support it.

Katie Pettifer: Yes. From a food safety perspective, having a closer relationship with our biggest trading partner gives us a lot of opportunity to improve food safety, so it is a good thing from our perspective too.

Q392 Chair: We are kind of putting it all on red or all on black. Is that fair to say?

Katie Pettifer: We will keep doing the job. It is really important to say that, when we have talked to our board about what we prioritise, we have explicitly said that we will continue to take forward work that potentially increases divergence if it is necessary for food safety and public health.

Q393 Henry Tufnell: I am curious as to when you think the first precision-bred products will appear on our supermarket shelves.

Katie Pettifer: We are ready to start doing our bit of running the regime. The regs come into force in mid-November. Those who want to sell precision-bred products, first of all have to apply to DEFRA to get them agreed as a precision-bred organism—I think that there is a statutory timescale for DEFRA’s advisory committee of a couple of months—and then to us.

We will assess them. If they fall into the tier 1 of our two-tier process, that could be quite quick. It could take us a month or two as well. Potentially, if an applicant gets in immediately and it is a really easy process, they could get through the regulatory process in a matter of months. When they get on the shelves is a commercial issue as well for them. I don’t want to speculate on it.

Geoff Ogle: There is no change in the legal regime in Scotland at the moment. The Scottish Government have not made a decision on precision breeding, so it is as was, in terms of the general GMO rules still applying.

Q394 Henry Tufnell: That is helpful. Are you able to give a bit of detail in terms of the types of products and the country of origin?



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Katie Pettifer: Do you mean what kinds of thing are coming up that we are aware of?

Henry Tufnell: Yes.

Katie Pettifer: We don't have any applications yet, so I can just talk about what we know in the market generally. The Committee will probably have a similar sense. For example, there are already precision-bred mustard greens, which are less bitter, on the market in the US. We know of quite a few different types of products that are in development. I think the Committee went to the John Innes Centre, didn't you?

Chair: We did.

Katie Pettifer: It is working on a high-vitamin-D tomato, as an example. We know of other things in development stage, such as blight-resistant potatoes. There are a lot of products that have potential to bring real benefits. We have not made an assessment of which ones are likely to come first, or the viability. We are simply doing the safety regulator job.

Q395 **Henry Tufnell:** There is an impact, from a regulatory standpoint, on things such as traceability if you are looking at foreign third markets, or, if we as a country are looking to gain first-mover advantage, looking at the time it takes in respect of getting on a national list, for example. How do you view those two? There have been concerns raised on the traceability point in the other place.

Katie Pettifer: This is DEFRA's policy. DEFRA owns precision breeding. Our job will be to operate, effectively, another market authorisation scheme when it comes in.

On traceability, I know that there was a lot of discussion about that as the Bill was going through. In fact, our board looked at the consumer research on it very carefully and thought about it carefully. Ministers took a decision on what is happening by way of traceability.

We will have a register of everything that we have authorised, and it will be more enhanced than our usual registers, because we recognise that a lot of people will be using it. Ministers took the decision that they did not want to have labelling on products saying that they were precision-bred as mandatory. From our perspective, we don't think there is a need for food safety labelling on precision-bred products, because by definition those that are authorised will be safe, but we recognise that there is a lot of consumer interest in this.

Q396 **Henry Tufnell:** Do you think that there is a reputational risk for the UK in terms of there being a lack of oversight of products entering into the market first?

Katie Pettifer: In order to sell a precision-bred product in England, companies will have to come to us for authorisation, so there is no lack of



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oversight there. I think that it is probably a policy question for DEFRA on the wider reputational issues in precision breeding.

Q397 **Henry Tufnell:** You brought up the John Innes Centre, and the Committee visited that. There were concerns raised at the roundtable in respect to the tier 2 point that you have alluded to already, about whether that was too burdensome.

Katie Pettifer: We have been road-testing our guidance with the industry over the last few months. That is exactly why we do it—in order to get that kind of feedback. We have made quite a few changes to it as a result. When put the first wave of guidance out, the feedback we got from industry was that they saw it as very burdensome. I think there were some misunderstandings about what was actually required and we have refined it several times since then. That is the whole point of doing the stakeholder testing.

We have tried to design the tier 2 process so that it has what is necessary for safety but is not overly burdensome. There are five questions applicants have to answer when they self-assess which tier they are going into. They effectively have to answer, “Would it be a novel food?”, in which case it has to go into the tier 2 process. Has there been a nutritional change that might adversely affect consumers? Have there been changes in toxicity or changes in allergenicity or any other safety concerns? If the answer to any of those is yes, they go through the tier 2 process for that particular area. We have tried to keep it only to what is necessary for safety.

Q398 **Henry Tufnell:** Can I go back to the traceability and labelling point that we talked about earlier? In respect to the organic sector and devolved Administrations, concerns have been raised. I think the Soil Association has raised concerns. What is your view on that? How are you addressing those concerns?

Katie Pettifer: There are several things. It is entirely open to companies to put labelling on their products to say that they are either precision-bred or precision-breeding-free, depending on what they might want to be telling consumers, on a voluntary basis. That has not stopped.

The question whether there needs to be authenticity labelling saying, “This has come from precision breeding,” is one that is ultimately decided by DEFRA Ministers. These products are, by their nature, genetically identical to a product that could have been produced by traditional breeding techniques, so it will be very difficult to test for them. I think DEFRA Ministers reached the view that it was not proportionate to have the authenticity labelling.

Geoff Ogle: Katie mentioned some research in terms of consumer understanding. Certainly the research we did showed at the start of that point that the level of consumer understanding was pretty low. By the time we had gone through the process of understanding it, there was



quite a shift. There is certainly some work if and when precision breeding and its use starts to expand, and we will need to do more. That is a generic “we”, not necessarily us. There will be more to be done to explain to consumers exactly what it is, using some of the research we have done there to help inform consumers.

Katie Pettifer: Ipsos MORI did polling for us but also a whole succession of qualitative engagement. The more people knew about it, the more their views did shift.

Q399 **Henry Tufnell:** Do you think mandatory labelling plays a part in that consumer trust? Do you think that is an important point?

Katie Pettifer: We are doing what we can on the traceability by putting a register on our website of all the products that we have authorised, so it will be available for people to look at and search. That is how we are trying to make sure that there is clarity.

Q400 **Henry Tufnell:** We talked a lot about the SPS agreement, about dynamic alignment and potential exemptions to that, precision breeding being potentially one of them. Do you expect to make amendments to your draft guidance in the event of that? How are you preparing?

Katie Pettifer: We will get on and implement the law. Then, if there are changes as a result of an agreement, we will deal with that then. It is another one of these areas where the Government will have to decide whether they are seeking exemption and, if they are, what that looks like.

Q401 **Henry Tufnell:** What about in terms of additional red tape, additional burdens and those concerns that you have in respect of those negotiations?

Katie Pettifer: These are very much questions for DEFRA, so I don’t want to get too far into commenting on them, but obviously it is important that they understand the implications for business of anything that is agreed as part of an exemption.

Q402 **Henry Tufnell:** Finally from me, in terms of the United Kingdom Internal Market Act and how this relates in terms of the devolved Administrations, I am particularly concerned from a Welsh perspective. How are you working together, and with those Administrations, to manage the implications of that, particularly around the processing of PBOs and that cross-border regulatory enforcement?

Geoff Ogle: The United Kingdom Internal Market Act certainly complicates the legal landscape; that is for sure. In terms of guidance for Scottish businesses, we will need to look at what the English guidance says and adapt it accordingly in terms of the Scottish circumstances.

In terms of understanding it from an enforcement perspective, it is actually more complicated, because generally the law that applies is the law in the country of production rather than the law in the country of



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sale—I have an example about tomatoes if you really want it. It makes it more complicated in terms of the enforceability. If you are an EHO in Scotland and you find a product that does not comply with Scottish law, that does not mean that it is not compliant, because you have to go to the country of production and the law that applies there. If it is compliant in that country, it is compliant in terms of being able to be sold in Scotland.

Katie Pettifer: The United Kingdom Internal Market Act in theory means that the authorised products themselves could be sold anywhere in the UK lawfully, although businesses will obviously have to take their own advice and look at it. That does not apply if there is onward processing, so it is quite complex. We are producing guidance for enforcement authorities in England, Wales and Northern Ireland and collaborating with Geoff's team to make sure that he has what he needs to do guidance for enforcement authorities in Scotland, so that there is as much clarity as possible.

Geoff Ogle: I can give a practical example if you want it. Let us take a precision-bred tomato. If the precision-bred tomato is produced in England, it can be sold in Scotland. If the precision-bred tomato is used to make a lasagne in England, it could be sold in Scotland. If a producer in Scotland bought a precision-bred tomato, they could not sell it in Scotland. If they turned it into a lasagne, they could not sell it in Scotland, but they could sell it in England.

Katie Pettifer: Businesses are going to have to take some legal advice on this.

Q403 **Henry Tufnell:** From a Welsh perspective, you could buy a precision-bred seed, but you could not cultivate it in Wales.

Katie Pettifer: It is a really complex picture. We are conscious of that. Going back to our previous point for a moment, it is also worth noting that the EU is also looking at precision breeding itself and may end up making changes in its own regime, which will affect all of us if there is an SPS agreement potentially, but Northern Ireland in particular, which follows EU law.

Q404 **Henry Tufnell:** In terms of that divergence, presumably this is an active conversation that you are having. It could potentially be quite harmful in respect of farmers and producers if there is significant divergence.

Katie Pettifer: It is an active conversation that has been had, I believe, by DEFRA all the way through the process. From our perspective, what is really important is that businesses know what they need to do to go through the regulatory regime, and enforcement authorities know what they need to do in each part of the UK, so we are trying to get as much clarity as we can.

Q405 **Chair:** Let us bring this back to the consumer's end of the telescope. I noted you earlier saying that there were no food safety needs that would



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require labelling of PBOs. Is that correct?

Katie Pettifer: Yes, and that is the area of our responsibility, where we would have asked for it if it was needed.

Q406 **Chair:** Geoff, do you agree with that?

Geoff Ogle: Yes, but obviously the Scottish position is different.

Q407 **Chair:** Whatever the reason for the position taken by your ministerial superiors, food safety is not part of that—or do your Ministers disagree with your assessment on food safety?

Geoff Ogle: No, I am not aware that they disagree with our assessment on food safety.

Q408 **Chair:** So that was essentially a political decision, rather than—

Geoff Ogle: Yes.

Chair: Okay. That is handy to know. Thank you very much. We are going to move on now to some questions around illegal personal meat imports, commercial imports and food crime.

Q409 **Josh Newbury:** This is a topic that we talk about a lot as a Committee, for obvious reasons. When we published our report recently, the Chair stated that the country could be one carelessly discarded ham sandwich away from a full-blown biosecurity crisis. I do not think that that is a flippant remark, because we know that the 2001 foot and mouth outbreak cost the nation billions, and millions of livestock. How large do you think the scale of illegal imports coming into the UK is and what are the factors that are driving that trade?

Katie Pettifer: I wish I could give you an answer on that first point, because one of the problems is that we do not have the intelligence to answer that question. The Committee has identified that in its report. Our National Food Crime Unit is definitely concerned about this as an area and is working on it in quite some detail, but we need more intelligence from partners across the system to make a comprehensive assessment.

Q410 **Josh Newbury:** Did you have anything to add, Geoff?

Geoff Ogle: In some of the evidence that we have seen, there are clearly some cultural aspects to some of this trade. That brings a complexity in terms of getting the intelligence and the information to be able to do something with it.

Katie Pettifer: We do know about the seizures, which I think the Committee is well aware of. Certainly inland, we have worked to support local authorities in seizing about 40 tonnes of illegally imported meat since April 2024, so that is definitely an area of concern for us.

Q411 **Josh Newbury:** Do you feel like that is on the increase? One thing we have heard from DEFRA is that it feels that the rising figures that we are



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seeing are just as a result of more checks and more intelligence, as opposed to a rising issue.

Katie Pettifer: That is the difficult thing to say. I don't think we have the intelligence to predict whether it will increase. There is clearly demand. For example, in Northern Ireland we know that there is a strong trend of demand for illegally imported meat products from Moldova. The last seizure was just last week, so there is clearly a continuing demand. There are different routes in, which I am sure we will get into. I think the commercial route is now better protected than it was, but we don't know what we don't know.

Q412 **Josh Newbury:** It was quite a low bar to begin with, I think. One thing we raised when we were in Brussels is the fact that a lot of Moldovan products are being labelled as Romanian to allow them to pass through more freely perhaps than they would if they were a non-EU good.

On how seriously the Government are taking this and how it is being tackled within the Whitehall machine, obviously you have the National Food Crime Unit, but some of the staff that we have spoken to at the coalface—the ones stopping vehicles at ports—feel like these things are rarely thought about or discussed in Whitehall. For example, the late confirmation of funding for the Dover Port Health Authority's checks made them feel that they are something of an afterthought.

It sounds, from what you are saying, that it is a major priority for you. How do you feel that emphasis is within Government? Do you think that it is high enough? Do you think that this is discussed often enough? Could we do better?

Katie Pettifer: I would love it to go up the priority list. I am obviously not having to make the resourcing decisions in Government about what the priorities are. From our perspective, both of our organisations sit on the DEFRA-led illegal imports and avoidance working group, which is doing intelligence sharing and discussing the response to this area. The more intelligence sharing that we can do with partners, including Dover, the better.

Our bit of it is inland. We don't have powers to stop anyone at the border. Our National Food Crime Unit cannot do that. Once the product gets into the UK, we can work with local authorities. We are very practised at co-ordinating and sharing intelligence with local authorities and operations to get seizures. We just need to join up the border and the inland.

Geoff Ogle: The thing about this is that it is the overall system and the controls within the system that are really important. Border controls are clearly an important aspect of that overall control, but so is the broader surveillance, inspections and sampling. All that feeds into the overall assurance of the system.



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Katie Pettifer: The response is necessarily going to be intelligence-driven.

Q413 **Josh Newbury:** In terms of public awareness, this is something that we have been quite concerned about as a Committee. Do you think the public are sufficiently aware of both the biosecurity and the food safety risks of illegal meat and the rules around personal imports, for example? What are you doing to improve public awareness?

One thing that we have done as a Committee, since we have discussed this, is, whenever we have been coming in and out of ports of entry, we have had a look to see whether public information is clearly available. We have noted a real mixed picture. For example, when we came back into St Pancras from Brussels last week, we saw next to nothing. At Brussels-Midi station, there were pork products on sale in duty-free. We were chuntering about it as a Committee because we are aware of it, but for a regular traveller, is there enough information there? Are you able to put any pressure on to try to increase that?

Katie Pettifer: We have not made an assessment of that in the FSA and do not have research that tells us about consumer awareness, although it is something that we are thinking of. For example, in Northern Ireland, on the Moldovan meat example, we have made an early start in seeing how we can try to engage with the community there that is driving the demand.

It is DEFRA's responsibility, and that of others in Government, to think about what should be displayed at the border. I know that they have done some piloting in the past. A couple of years ago, they piloted something on Romanian pork products, trying to raise awareness both before and after import, and we would certainly be happy to talk about how we could support that kind of thing.

Q414 **Josh Newbury:** Just lastly, before I hand over to Charlie, you mentioned intelligence. Intelligence-led checks are something that we hear about quite a lot. Clearly, we cannot stop every vehicle or every import of illegal meat. Is the current approach sufficiently protecting our domestic food and agricultural sectors? For example, is the 20% coverage that we have at Dover and the lack of consistency perhaps across different ports of entry, of concern? Are we doing well enough as it is?

Katie Pettifer: We would like a better intelligence picture. We would like more details routinely coming through to us on what is being checked and what is being found, so that we can then work inland and, similarly, pass our intelligence back. Our National Food Crime Unit has done some work to help try to identify where more checks might be needed. I will not go into the details of how in a public hearing, if that is okay, but we would be very happy to give the Committee a private briefing on NFCU work if that is helpful.

There are also things that we would like to do. We have suggested to Dover that we could participate in a joint piece of work on sampling the



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meat that is being seized, so that we get a better understanding of the public health implications of that. We have certainly heard anecdotally, as has the Committee, about the type of conditions in which the meat is coming in.

The picture is not as strong as we would like it to be on the evidence and intelligence there, and we have some things that we can do to improve that.

Geoff Ogle: The other thing is the role that certain parts of the industry can play. I am not talking about large retailers, but local supply and local markets. If we can get more information on those, that would certainly help in terms of building up the intelligence picture, because this is not a large-scale retailer problem. You have to dig down into where the demand is, and therefore where the supply is going. Some of that really requires local businesses and local industries to start giving us more information.

Q415 **Josh Newbury:** Again, that is where the local authority role is so important, but we know that they are under strain as well, which is something that we might come on to later. Just on that offer to Dover, has that been met with positivity? Is it a resource issue?

Katie Pettifer: I am waiting for a response. I hope so.

Q416 **Charlie Dewhirst:** On that specific point about demand, leaving aside the person who comes back from holiday with a salami, we are talking about what is probably organised crime in terms of the volumes of meat that are being seized. Where is that meat being sold, on the whole?

Geoff Ogle: It will depend on where the demand is. I need to say sheep smokies rather than fish. If you take smokies, for example, as I remember—I am going back to my FSA days now—there was quite a lot of demand around particular conurbations in Birmingham, for example. Some of that demand will be driven by the type of meat that it is and where those communities are located. That would be a good starting point in terms of trying to identify where some of the risks might be.

Q417 **Charlie Dewhirst:** As you say, it is not going to major retailers. That would be unlikely. It is more like certain preferences in certain areas, which cannot be produced legally in the UK. In the case of Romania, for example, and its very high prevalence of African swine fever and, therefore, its inability to export pork from most regions, I suspect that is entering the supply chain probably in all sorts of ways. Is it food service, perhaps?

Katie Pettifer: It could be. There is a local join-up point here as well, in that we hear anecdotally from environmental health teams of finding meat of dubious origin—and this is a trading standards issue—and then joining up locally to try to tell trading standards to look at it. It is being picked up in different places across the food system. It goes back to my point about trying to gather all of this together.



Geoff Ogle: A common agreement talks about institutional access. Being back as part of the EU food fraud network would certainly help in terms of being able to share intelligence between us and other member states. That would definitely help.

Q418 **Charlie Dewhirst:** A number of organisations are involved in the UK side of this, whether it is yourselves, the National Food Crime Unit, Border Force or port health authorities. The Committee's recommendation was for a taskforce to look at this to try to get a grip and take responsibility. Would that be helpful to you?

Katie Pettifer: There is definitely a case for a more co-ordinated response and more joint working, as you say. We are standing ready to play our part in that. I will let DEFRA give their view on what structure they think is most appropriate, and they will be responding to the Committee's report pretty soon.

Q419 **Charlie Dewhirst:** Moving on to the commercial side as opposed to personal imports, you alluded to the fact that BTOM has brought some more resilience in terms of food safety and that side of it. To what extent are you concerned about illegal imports through commercial routes as opposed to through those personal routes?

Katie Pettifer: We were very concerned when there was more of a risk that they were getting through under the TODCOF feature. If I say "TODCOF", does everyone know what I mean? I thought so. I was talking about the seizures that have happened inland. A lot of that is from us getting information from customs about things that have come in, presumably through that route. The number of seizures at Dover on the non-commercial route have gone up since that feature has been turned off for the higher-risk consignments. There was a risk there that has been mitigated.

Port health authorities are pretty good at doing risk-based checks on things that are coming in through the commercial route, where there are red flags, depending on the country it has come from and on what is going on with the paperwork. They are quite good at spotting where they need to do checks, but they are checks, and what we cannot say with any certainty is how much is getting through.

Q420 **Charlie Dewhirst:** We hear anecdotally about lorries registered as empty, which no one is going to check because they are empty, and that being a problem in terms of illegal imports. In terms of cross-border working between yourselves, how does that operate on a day-to-day basis in terms of intelligence sharing?

Geoff Ogle: Certainly, in terms of the food crime areas, there is quite a lot of liaison and sharing of information. The strategic assessment that we do on a fairly regular basis is a joint endeavour. The UK structure in terms of food is integrated across Great Britain and Ireland, but certainly, because of that integration, you do need to work together. When there are potential issues that are cross-border, the two teams will work quite



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closely together. There have been occasions in terms of mutual assistance and investigation capacity when we have offered reciprocally to make that available. The two teams are, basically, staffed by ex-police, so that helps in terms of building the relationships. They do work extremely closely together, as well as sharing techniques and information and all that sort of stuff.

Katie Pettifer: We do cross-border operations on things such as smokies. We have a joint intelligence forum with APHA as well, so we have the structures in place. Geoff and I meet weekly and try to ensure that our organisations are, as far as possible, working as one in a very integrated way.

Q421 **Charlie Dewhirst:** Are there any barriers that you would like to see removed in terms of operational intelligence sharing that would help you do your jobs?

Geoff Ogle: I don't think there is anything in operational intelligence that would get in the way. Certainly for us, the relationships that we have with Police Scotland, for example, in terms of being able to take cases forward is very good. We have adopted, effectively, a lot of the police systems and processes, so that on the occasions when we do need to hand over something to the police, it is pretty much wrapped up as a bundle that the police can take forward straightaway.

The backstop that we have is a memorandum of understanding between the two of us, which we have never had to invoke, to be honest, but it is there in case something did fall off the wagon, so to speak.

Katie Pettifer: The challenges in terms of working cross-border across the UK tend to come more in the policy space, where Governments take different views on different things and have different risk appetites.

Chair: We are going to come on now to some questions around the food strategy, sustainability and climate change adaptation. Ben has just had to step out for a minute and will be back very soon. Susan, can I invite you to open the questions on that?

Q422 **Susan Murray:** We talked earlier about the food strategy. To what extent were your organisations involved in the development and implementation of the strategy? What assessments have you made, if any, after its publication?

Geoff Ogle: In terms of the development of the strategy, DEFRA set up a devolved Administration senior group. They shared early drafts of the food strategy that we were able to give a view on. That working arrangement is still in place. In terms of some of the development in the mandatory targets that we are talking about, a number of my staff have been involved in working with DHSC on that.

The strategy is primarily aimed at England, but DEFRA did recognise some of the overlaps and the broader aspects of some of the policy input.



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Certainly from our perspective, given some of the reserved nature of the issues, we are quite happy with a four-nations approach to take it forward. It feels to me like we have been pretty well engaged on it.

Katie Pettifer: We sit on the internal Government groups that DEFRA has set up to work on it with other Departments. Our chair frequently meets the DEFRA Minister. She has two hats in this area, in that she also sits on the food strategy advisory board in her personal capacity as a professor at Oxford. We have been extremely well integrated into it.

As I said earlier, the publication from DEFRA over the summer is just one stage in the process. It is not, "That is the strategy. Now it is done, and we are thinking about implementation." I am expecting that joint work to continue.

Q423 **Susan Murray:** So you are happy that the devolved nature of the work is working well and that it is appropriate for it to be seen as a four-nations approach.

Geoff Ogle: Yes—so far, so good. I don't know if Scottish Government Ministers have given a view on the four-nations approach yet. Certainly from our perspective, in terms of our role around advice on public health and diet, we are quite happy to support a four-nations approach.

Q424 **Susan Murray:** Food sustainability is a key part of the strategy. As regulators, what are your biggest concerns regarding the sustainability and safety of the food system, particularly with respect to, as was mentioned earlier, the climate change and geopolitical pressures? How would you like to see those addressed?

Geoff Ogle: It is more complex than it was 15 to 20 years ago, for sure. There is a dynamic now between sustainability and climate, food security and food safety. Then you wrap in one health around all of that as well, and you have a fairly complex puzzle. If you look at some of the climatic issues that we have had in terms of poor diets and everything else, that certainly raises risks around authenticity and food safety. Food security affects supply and demand. Again, that potentially impacts on food safety. They are all interwoven.

We have also seen, for example, with the Russian invasion of Ukraine, particularly with things such as sunflower, the impact that that had in terms of food supply and security. Someone made quite an interesting comment to me, which was that the political focus is on sustainability and security because they are and will be ongoing issues, but food safety is seen as a given. I am not entirely sure that food safety is a given. When there is a big problem, it does not feel like a given.

In terms of the dynamics now between all of those three, you cannot look at one in isolation without understanding the impact on the other two aspects of it, so it is a more complex picture that you have to consider now.



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Katie Pettifer: I would agree with that. We cannot take the future supply of safe food for granted in a way that we might have been doing 10 to 15 years ago. The UK food security report makes it clear that factors include climate change and driving volatility in the food system. Geopolitics is now layering on top of that. Geoff mentioned the example of where Russia invaded Ukraine and our food sector ran out of sunflower oil, which is in a lot of products. There will be more shocks like that in the future. Supply chains are more complex. I can give examples, but it looks like we may be moving on.

Q425 **Chair:** Before I come to Ben, Geoff, you mentioned earlier the advice of the Climate Change Committee to the Scottish Government, which was for a reduction in livestock numbers in Scotland by something in the region of 35%.

Geoff Ogle: Yes, a reduction in red meat consumption.

Chair: That is advice that has been rejected by the Scottish Government. I would quite easily agree with that, because there is an issue for Scottish agriculture about critical mass there. Might it be worth the Climate Change Committee, where it is to deal with issues around food production, looking at questions of sustainability and food security, as well as the other climate conditions that are currently within its remit?

Geoff Ogle: It certainly needs to sit somewhere.

Q426 **Chair:** It is a remit from 2008. Nobody spoke about food security in 2008 because, a bit like food safety today, we took it for granted.

Geoff Ogle: The Government agreed with our recommendations and rejected the Climate Change Committee's recommendations. But I think that increasingly, there will be a tension between what you might want to do for climate change purposes and what the consequences might be in terms of food safety, durability, waste and public health. All those factors need to be given some weighting, although not necessarily equal weighting.

Katie Pettifer: These things really come together when you think about people and their choices around food. In terms of our consumer research on people's concerns about food, nearly half of people say that they are trying to eat less processed food. About a third are trying to cut food waste. About a fifth are trying to eat less meat. But when you ask people what their concerns are in order, the absolute biggest one, at 75%, is the price of food. If these things are in tension, it is then very difficult for consumers and people to think, "What do I put in my basket?"

Geoff Ogle: The consumer behaviour around this is also really important. Telling people, "You need to eat less red meat" does not necessarily equate to them eating less red meat.

Chair: It is about the numbers.



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Geoff Ogle: It is about how you influence consumer eating patterns and behaviours. They have to be part of the equation as well.

Chair: As someone with an interest in hill farming, I have no problem with that.

Q427 **Ben Coleman:** That is a very neat segue. I wanted to ask you about ultra-processed foods, and also about affordability, so thank you for coming into that already. In the surveys and the work that you have done, ultra-processed foods have, as you say, consistently been highlighted as a top concern for British consumers. Are you worried about the explosion in ultra-processed foods as well?

Katie Pettifer: I will give a brief answer, and then Geoff will probably have more to say because he has responsibilities in the nutrition area. From our perspective, we know that it is something that people are worried about, and it is a really confusing area. One of the things that we have done is to put out an explainer to people about what the scientific evidence does and does not say on it. The science is, as yet, still developing. SACN said that more research was needed on it, but it is important that people can try to make informed choices.

We also approve all the food additives as part of the market authorisation regime. Individually, we are making sure that these additives are safe, but collectively, the question whether there is too much ultra-processed food in people's diets is really one for the Department of Health in England, and I have passed neatly over to my colleague.

Geoff Ogle: There are a couple of important points. The first is that processing has no bearing on nutritional content. There are some products, such as wholemeal bread and high-fibre cereals, that would be classed as ultra-processed but are actually dietarily beneficial, so there is some degree of misunderstanding around UPFs, in that they are not all bad.

Q428 **Ben Coleman:** Forgive me for interrupting you, but that does sound like the industry speaking. When you say that they are not all bad, do you mean most of them are bad, or a few of them?

Geoff Ogle: I will pick that up in the second point. There are issues around affordability. Ultra-processed foods, which are high in fat, salt and sugar, generally tend to be cheaper, and therefore tend to be bought by lower socioeconomic groups, so there is definitely an affordability aspect and a correlation between some of the food being bought and socioeconomics.

The point that I would make, though, about ultra-processed foods at the other end of the process is that a lot of them are high fat, salt and sugar products, which are nutritionally poor, usually dense in calories and not very beneficial in terms of diet. Certainly, the message that we have been giving to consumers is, "If you want to eat fewer ultra-processed foods, eat fewer high fat, salt and sugar foods, because they are quite clearly



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ultra-processed and not very good for you nutritionally or in dietary terms, either.”

Katie Pettifer: That is what our explainer says as well.

Q429 **Ben Coleman:** I understand that. I spent a fair amount of the summer reading Chris van Tulleken’s book, *Ultra-Processed People*. I understand your point about the evidence not being absolutely clear, but it does stack up, particularly in relation to the combination of foods. There is a lot of work still to be done, and you are doing a lot of work in looking at it, I presume. What do you think of the omission of ultra-processed foods from the food strategy? Should there have been something more of a focus on them in that? Would it help your work if there had been?

Katie Pettifer: It is not my area to comment on from a policy perspective, but the evidence is clear on high fat, salt and sugar, and I would not want to see the dilution of tackling that because people are then moving on to ultra-processed foods. It is important that we don’t avoid that from a consumer protection perspective.

Geoff Ogle: This is an area where the food strategy is less important for us in terms of our ability to control. Our view is that we need to tackle the food environment. In Scotland, for instance, something like 25% of calories comes from the out-of-home sector. That is a huge proportion of the diet and the calorific intake. Look at the explosion of takeaways and all those sorts of things.

We did some research a few years ago now, which I can also make available, which took some common favourites, if you like—fish and chips, burger and chips, and those sorts of things. We did an assessment, and you could get fish and chips at 700 calories or at 2,000 calories. If you can produce it at 700 calories, there should not be any need to produce it at 2,000 calories. The issue for us is around the food environment and what is sold. The amount of ultra-processed, high fat, salt and sugar food that is sold is too much and needs to be reduced.

Katie Pettifer: The point that you raised about needing to build more of an evidence base is really important. I don’t think that I answered that, but we are involved in it. Counterparts in health are involved in it. We are doing work with UKRI at the moment on the public dialogue that they are doing with consumers on ultra-processed food. We are also helping to shape the scientific research that is going on, particularly with our role in authorising additives in mind.

Q430 **Ben Coleman:** I want to talk about affordability. You mentioned mandatory health reporting for supermarkets, which the Government are bringing in rather slowly. You are going to be working things out over the next two years, and working out targets and fines over the next four years. Am I right? I am happy to be corrected on that.

Katie Pettifer: The Department of Health is.



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Q431 **Ben Coleman:** I thought the FSA was, but the Department of Health is. That is good.

Katie Pettifer: If they ask the FSA to be the regulator, which they have not done, we may have a role in it.

Q432 **Ben Coleman:** That is helpful. Do you see a role for making supermarkets discount healthier foods? Part of the problem, as you have just said, is that there is a lot of rubbish food out there containing high fat, sugar and salt, but it is cheaper, so people will of course buy it. We cannot make food healthier and more expensive if people cannot afford to buy it. Should there be discounting?

Katie Pettifer: The benefit of the healthy food mandatory reporting and, potentially, targets for supermarkets is that the supermarkets then have to take responsibility for making it happen in the best way. The Government have imposed various bits of regulation around where foods can be sold and displayed and how they are priced, but the supermarkets know very well how to sell more of different types of food. They know their market. They know their consumers. They are really well placed to make the shift in sales and to work out the best way to do that. The point of the mandatory reporting and targets would be to say to the supermarkets, "You make the shift. You work out the best way to do it," and I can definitely see the logic in that as a regulator.

Geoff Ogle: Certainly on the retail side, a number of retailers are now pushing for mandation. The reality is that there is nothing to stop businesses and large manufacturers reformulating. We have done some research this year that we published on children's dietary health. Cereals are the main source of micronutrients for children in Scotland, but they are also the product with the highest amount of added sugar. Why are they putting so much sugar in a cereal? Keep the micronutrient bit and reduce the sugar. We are not saying, "Take all the sugar out in one day." You have to change the taste buds, but you can reduce it gradually.

There is nothing to stop the manufacturing industry doing that now. The fact that we have got to the point where we are talking about mandation is because they have not. The idea that you can get micronutrients from cereals, then dental caries and a visit to the dentist, is not really a good public health outcome for children's diets, but we still have loads and loads of added sugar in cereals.

Q433 **Ben Coleman:** It is absolutely shameful. It is the same with baby food products, which, of course, we are taking action on. Manufacturers still put sugar in baby food products. It is absolutely disgraceful and shameful, and I am glad that we are taking action.

Talking of sugar, we have sugar added to milk-based products and non-milk-based products. I have stopped drinking oat milk since I realised that most of it contains added sugar, and have gone back to milk. Is extending the soft drinks levy to these products effective? Is it a good idea?



Geoff Ogle: Our evidence is that the sugar levy was effective both in terms of the speed at which industry reformulated and the reduction in consumption of full-fat, full-sugar drinks. For example, we have seen reductions in obesity where there has been the greatest reduction in consumption of full-sugar drinks. Our evidence base is that that reformulation did work. We are supportive of an extension of that levy to other milk-based drinks, but there is a broader question around the quantum of sugar in lots of products, whereby you think, "Why just drinks?"

Q434 **Ben Coleman:** Would you extend it to milk and milk-based products as well?

Geoff Ogle: If I had a magic wand, yes.

Q435 **Ben Coleman:** Would you do the same?

Katie Pettifer: It is not our area, and I am not going to comment on tax policy.

Chair: Thank you, Ben, and welcome back to the community of milk drinkers.

Sarah Bool: As a type 1 diabetic, I am very conscious about sugar contents and things. There is sometimes but not always a benefit in knowing the level of sugar in a drink. I know that the amount of sugar in some fizzy drinks has changed. That has been a normal diabetics' go-to and suddenly it does not have the same effect. The point from a type 1 diabetic is that it is just a warning about how we publicise it.

Q436 **Sarah Dyke:** Apologies that I had to leave earlier. Good morning. Abattoirs play a vital role in protecting food security and food safety, safeguarding animal welfare and underpinning consumer confidence, but they also contribute to the wider rural economy in terms of providing skills and employment, generating demand and addressing waste management, as well as the local food chain for livestock farmers.

I have done quite a lot of work on this. I held a Westminster Hall debate in May on this subject. We know that there are lots of models of abattoirs, but they continue to deal with increased costs, such as energy costs, and recently the increase in employers' national insurance contributions, all threatening the viability of their businesses. What changes have you identified within the abattoir sector in recent years? What impacts are the changes in the sector having on the meat processing and livestock sectors?

Katie Pettifer: First of all, I agree with everything that you have just said. We have a very close relationship with abattoirs, in that our staff and our contractors are there on the line every day, making sure that the food is safe with the business. That brings its tensions, but ultimately enables them to trade and sell, and gives people confidence in the quality and safety of British meat.



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We have seen the sector consolidate quite a lot in recent years. There are now about 50 small abattoirs across England, Wales and Northern Ireland. The number has reduced, and that is a concern for us. We have been thinking about it very carefully in the work that we have been doing with the board on the discount that we offer to our meat charges, which I am happy to go into now, although I don't know if you are coming on to it. Our board recognises the really important role that small abattoirs play in local economies and in animal welfare in terms of reducing transportation for animals, and the pressures that are on them.

Q437 Sarah Dyke: I am quite happy for you to go on to that because, as you quite rightly said, there are now 47 and the figure is dropping quite dramatically. In 10 years' time, if we continue on the current trajectory, there will not be any small abattoirs left in the country. There is more pressure as we are losing abattoirs right across the country.

The south-east is particularly badly affected. Farmers are moving their livestock from the Isle of Wight up into Hassocks, so they are having to travel much further to get the right abattoir in order to service their needs, and particularly small abattoirs that are serving organic or rare breeds, etc.

It is these abattoirs that are really hampered by this expensive and punitive regulatory system that is not suited to the nuances that they need to be able to operate under. What can you say in terms of how that will help secure the viability and the future of these abattoirs?

Katie Pettifer: The wider question of the future sustainability and viability of abattoirs is much bigger than our charging. They are, effectively, small businesses working in a very difficult environment. I know that DEFRA has done a lot with them in the past. It has been a real focus, and I am sure that it will continue to be.

In terms of our regulation specifically, the expectation is that the regulated industry bears the costs of the regulation. We don't have that fully in the meat sector. We give a discount to the meat industry, which is heavily weighted towards the smaller end of the sector, although at the moment it has applied across the industry. Last year our discount was about 29%, which is then funded by the taxpayer. This year it is about 25%. We have been gradually reducing it.

For small abattoirs, the costs of the regulation per animal are higher than for big ones, as you say, so the burden of regulation falls disproportionately on them. Therefore, we give them a much bigger discount. On average, the 20% smallest abattoirs got a discount of 88% on our charges last year, so we are already doing as much as we can there to try to subsidise the sector.

We have been thinking about how that discount needs to change, because Treasury rules, in "Managing public money", say that, if you are going to provide a service, you have to charge the full cost of it, unless Ministers have agreed an objective reason for not doing so, and then you



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have to keep reviewing it. We are going through that review process at the moment. We did a call for evidence last year. The board looked at this in June, I think—it may have been March—and we agreed with our board that there continues to be a case for a discount for the smallest abattoirs. The board did not believe that there was a case for a discount for the largest ones. These are big businesses that are economically viable without the discount, and the idea of taxpayers paying for them is difficult to justify.

We are now going through the process of designing exactly what a discount regime that is focused on small abattoirs could look like in the future, and there are some difficult questions around the medium size that we are working through. We are doing a lot of consultation with the industry and are bringing a paper back to our board in December. Ultimately, it will be a decision for Ministers then, so we will put some advice to them on what a new scheme would look like.

Q438 Sarah Dyke: That is really important because of the pressures that small and medium-sized abattoirs are facing. The industry is in crisis. If we do not sort the issue out we shall be losing those businesses, which are critical to the supply chain in rural areas.

Just looking at this in a bit more detail, my local abattoir in Wincanton, in Glastonbury and Somerton, can kill only between 6 am and noon, every day of the week, and they can do that only when there is an official veterinarian present. Sometimes the OV is late.

I was talking to the slaughterhouse recently, and they were saying that they could not carry on until the OV had arrived. It was a sheep day, so they got through as many as they could. At the end of the day, 12 o'clock came, and there was one lamb left to slaughter. The OV said, "That is the end of my shift. I am going home." This solitary lamb had to be picked up by the farmer, taken home and brought back another day. This was burdensome and costly, not only for the abattoir but for the farmer, and inconvenient for everybody. Are the strict guidelines that seem to lack common sense in this example that I have just given an example of a system that just adds undue pressure on abattoirs?

Katie Pettifer: I don't know what was going on with the OV in that particular example.

Sarah Dyke: I don't think that it is unique.

Katie Pettifer: First of all, just stepping back for a moment, while I recognise all of the pressures on small abattoirs, it is still crucial that meat is safe, that we keep public confidence in meat, and that we keep our ability to trade in meat. We are protecting something precious here, and we don't take that lightly.

The law requires OV presence for killing. There are some flexibilities at the very smallest end of the spectrum. EU member states have more flexibilities, and that might be something that we can explore as we get



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towards an SBS agreement, but we have to apply the law as it stands. If we start trying to change the law—and we have looked at it, and we did a whole exercise with the meat industry a couple of years ago after EU exit—then we put in jeopardy a trade that is worth over £2 billion to the UK meat industry. We have to be very careful. We have to apply the law.

In terms of how we do it, though, we try to work as collaboratively as we can with the abattoirs, so what you said does concern me. I am happy to take that away. In terms of lateness, we ask businesses to tell us if the OV's are late. We have had only 24 reported incidents of lateness over about 900 shifts a week over the last year, so the picture that we are getting is good. If it is not what businesses are getting, I would like to hear about it.

Q439 Sarah Dyke: In addition to that, an abattoir that I visited a couple of months ago in my research for the debate said that they had had their annual inspection. Two weeks later, an OV came out for an ad hoc inspection, and there were more faults found during that time. It seems ridiculous that there was an annual inspection that was carried out at a point, which they were ready for. They passed that, and then, several weeks later, there was another ad hoc visit and more issues were found. They were charged by the hour. This vet came out and was charging the business for this time. Then the business had to deal with these other issues.

I have heard from a lot of organisations that they are really quite distressed about these unannounced inspections, and then enforcement notices that are put on them for the infractions that were not brought up during the most recent audit. Is the FSA aware of these pressures on these small businesses that are working really hard, under huge amounts of pressure, and trying to keep the supply chain alive?

Katie Pettifer: The unannounced inspections are, by their nature, unannounced, as they are across the rest of the food industry.

Q440 Sarah Dyke: It is their hourly rate.

Katie Pettifer: First of all, on the point about enforcement, we do try really hard to work collaboratively with the business. When we identify something that is a risk or is a contravention of the law, we have to raise it, but only two of the 51 small abattoirs that we regulate that are currently operating have had enforcement notices in the last three years. It was a total of four, and they were on issues such as cleanliness and temperature control, which are really important issues. There is an inherent tension between the abattoir and the FSA staff, because we are often trying to get them to do things that add cost, and that is difficult to manage. We try to manage it as best we can, and it is something that is a constant source of dialogue between us and the industry.

Q441 Sarah Dyke: This one example, though, is one that I really want to pick on. They had had their audit. Two weeks later it was followed up, and it felt to this particular business that the OV had really nothing else to do,



so they just came back two weeks later. It was something absolutely ridiculous, like some horsehair on a door, which should have been picked up at the time. That is the frustration.

Businesses feel that they are having to deal with another OV's visit. There is no confidence in those inspections, because they are coming back again and are always being checked out when they feel that they are doing a good job and have gone through their inspection properly, as they should. That is the issue. On an hourly rate, they are then being charged for this. I know that those businesses have made their case quite clearly about their frustrations to the FSA on that.

If I may, just going on to the workforce, one in four food and drink workers will retire in the next year. The average age for a small abattoir operator is between 60 and 70. In line with Henry Dimbleby's national food strategy, we have to start investing in training and education within the food sector as a whole. Do we have to reform training for the abattoir and butchery apprenticeships, so that we can ensure that we are future-proofing those skills in the industry going forward?

Katie Pettifer: On the workforce generally across the food industry, what you are saying is also reflected in the workforces that we rely on for regulation. Our meat hygiene inspectors are an ageing workforce. We may come on to environmental health and trading standards, but we have very similar concerns. A push is needed across the whole industry to get people into these roles.

Training for butchers and abattoir inspectors is a bit outside my remit. It is not something that I have made an assessment of.

Q442 **Sarah Dyke:** I want to go back to the veterinary workforce shortages affecting specifically the work of abattoirs. What steps could your respective organisations and Governments take to address the impact of the shortages in the veterinary industry at the moment?

Katie Pettifer: I will speak to it, and then Geoff will also have a perspective on this, I am sure. The first thing to say on vets is that we are in a better position than when my predecessor was in front of the Committee in 2024, in that we have a more stable position in our vet resourcing. When she spoke to you, our attrition rate was about 35%. It is now 24%. That is, in part, because of steps that we have taken.

One of the big reasons why vets were leaving is because they did not meet the English language requirements for RCVS registration in time. They had an 18-month window in which to do it. We now have our new vet track programme that our service delivery partners run, which allows vets from overseas to come in as meat hygiene inspectors first, and work towards getting the English language requirement before moving into a vet role. In fact, not only do we have a lower attrition rate—which is still high but about right for the sector—but we are filling the roles really quickly when they come up.



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The other thing is that the salaries have gone up, in part as a result of visa salary rule changes made by the Home Office. It has made them more attractive. It has cost the taxpayer, via us and industry, millions of pounds, but it has made them more attractive. However, we are still overwhelmingly dependent on international vets to deliver our controls. 96% of our vets working in OV roles in the FSA are from overseas, and so there is still a huge challenge in terms of the domestic workforce.

One of the things that is really important is for us to continue the work on thinking about the Veterinary Surgeons Act. I would really like Government to look at reviewing that. I might pause there and let Geoff give his perspective, and perhaps we can come back to it.

Geoff Ogle: There are broader questions around workforce. It does not matter whether you are from the Government end or the industry end. There are problems with workforce and the demographics of that. In the abattoir sector, there is a huge reliance on a migrant workforce, for example. We are doing some work with SRUC in Scotland, and Aberdeen vets' school, to try and encourage more of the indigenous population to move into public health veterinary service. The hard reality is that the indigenous population are not interested in public health veterinary service, and that is a real challenge.

There are issues around a migrant workforce for the sustainability of the industry. It will be for other parts of the UK Government and the Scottish Government to address education and apprenticeships. From my perspective, there is a real challenge in terms of that public health focus in terms of key skills such as those of vets, unlike in Romania and Spain, for example, where there is a very strong focus on public health, which is why we end up with a lot of vets from Spain and Romania.

Q443 **Sarah Dyke:** What strategies should we put in place to make sure that we have that workforce and train them up?

Katie Pettifer: There is a continuing push to the domestic vet training route to raise awareness of these careers, which we and our service delivery partners are trying to do. As Geoff said, it is reaping limited benefit at the moment. There is still work for us to do on the training and what prominence is given to public health veterinary medicine.

We need to look at what the role of a vet is, and this brings us to the Veterinary Surgeons Act, because we need to start thinking about how we deliver these controls through the wider veterinary team, not just the vet themselves. There are things that our vets do that do not necessarily need the skill set of a vet, but are required in law to be done by the vet because of our definition of a vet. That would definitely help give us greater resilience.

Q444 **Chair:** We did take an enormous number of veterinary surgeons for OV work from Spain. Am I right in thinking that that public health route, as you would call it, was an election that they made for the last couple of



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years of their degree, and was why you got that number of vets who were interested in that sort of work?

Katie Pettifer: I don't know about the course specifically. Do you, Geoff?

Geoff Ogle: No, I don't know that detail unfortunately, other than that what we see coming out of Spain is a lot more public health qualified vets than we get here.

Q445 **Chair:** It is an issue specifically around the recruitment and retention within the veterinary profession, and it is not unique to the OV's. This is something that goes right across the profession. As you say, there is an issue around the regulation of the veterinary surgeon, through the Veterinary Surgeons Act, which we shall have to come to.

That takes us on to the wider workforce shortages that we have, because it is not just the red meat OV's, but environmental health officers and trading standards officers. How much of that is a risk to food safety?

Katie Pettifer: It is definitely an area of real concern for us. If we look across the local authority landscape in the areas that the FSA works in, the number of trading standards officers who work on food has almost halved in the last 15 years. The number of environmental health officers has gone down by about 15%. The workforce has shrunk, and we hear from local authorities that it is getting harder and harder to fill those roles. The number of institutions offering the professional qualifications has shrunk.

At the same time, the job is getting bigger. The number of food businesses is growing, and we hear from local authorities that the pressure that their teams are under feels like it is growing. For us, it feels like we are not investing in the infrastructure that keeps food safe in this country. It is important to say that we have not seen a corresponding drop in compliance by businesses—on the whole, food hygiene ratings are staying very high—but my worry is that businesses are not getting the kind of advice and support that environmental health officers can give them at their food hygiene inspections when they have the time to do it. It is not just about compliance, but investing in the skills of the people working in the food businesses. For small businesses, this is often their best source of advice.

Q446 **Chair:** Is there a disparity in Scotland?

Geoff Ogle: Yes, it is worse in Scotland. There is a demographic correlation with the environmental health officer age profile in Scotland that is not helping. At the moment, we have only about 53% of the required posts filled. In systems terms, you have two main elements in assurance. You have the face-to-face inspection process, and you have sampling and surveillance. We are seeing a downward trend in the numbers of staff as well as in the numbers of samples. Compared to 2015-16, there has been a 46% drop in sampling in Scotland. Your two main systems of assurance are both under pressure.



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Katie Pettifer: We have seen a drop in sampling too. Just to add one final system of assurance, these are also the people who we call on when there is a food incident. When there is an outbreak of foodborne disease or contamination, these are the people at the local level who will be working with the businesses to get the food off the shelves and resolve that.

Geoff Ogle: In Scotland it is a bit of a mix, because in some instances it is not a lack of willingness. It is not a resource issue in terms of trying to get staff in. It is just that they cannot seem to attract staff. Scottish Borders, for example, has had problems recruiting people. There are the routes through as well, because the universities, as Katie says, are just not offering the courses, partly because the local authority is not offering the jobs because of the pressures that local authorities are under. You end up with this vicious circle of reductions in numbers, and the numbers leaving are not being compensated by the same numbers coming in.

Katie Pettifer: I was just going to talk about what we are doing about it, but that might be what you are going to ask.

Q447 **Chair:** Yes, I was coming on to that, because we have the National Food Crime Unit that is been set up under PACE. How is that being used in practice?

Katie Pettifer: That is a separate thing, which I am happy to talk about. They tackle serious crime in the food system, and trading standards will be tackling the layer below that of food inauthenticity.

Q448 **Chair:** Let us deal with trading standards first.

Katie Pettifer: There are three or four things that we are doing, depending on how you group them. First of all, we have to make the current system work as well as it can and ensure that local authorities can make the best use of the resources that they have. We have just revised what we ask of them on food standards, so that they can do inspections on much more of a risk basis and driven much more by intelligence, and put their energy where the greatest risk is. That is also good news for compliant businesses, because they will be less frequently inspected.

We are doing a set of changes to what we ask of them on food hygiene. We have just consulted on them. I am hoping that we will lay those very soon as well. They will enable them to make better use of posts such as regulatory support officers, and tools such as remote inspection at the very lowest-risk end. We always have judgments here about how much risk we are prepared to take, but we have to make best use of the people they do have.

We are trying to support routes into the profession. We have had very successful collaboration with CTSI on a level 6 trading standards apprenticeship. In the year or so after we had introduced it, we had about 80 people coming in and doing that on food standards, which was



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excellent, and we want to keep doing that. We are not the only people who use environmental health and trading standards, and I am also talking to lots of counterparts across Government in the other areas that do.

The third thing is that we need to think about new ways of regulating in the future, not just because of these workforce issues, but because the food sector is really changing around us. It is becoming much more data-driven. There are huge amounts of information out there that we are not utilising. The way that people buy food has changed. Online food sales are now hugely widely employed.

We have been doing things such as testing out, with five of the big retailers, a pilot of national-level regulation, where they gave us access to all of their internal compliance data for a year. We looked at whether that could enable us to make as good or better an assessment of what was going on in those businesses than the inspections on the ground, with some checks on the ground as well. That is an avenue that we need to keep looking down, because we have to make absolute best use of all the tools that are out there for regulation.

Geoff Ogle: We are doing a lot of what Katie said as well. The other thing that we are looking at in terms of our change programme is the introduction of charging food businesses. We are one of the few countries in the world that does not charge food businesses. We have been talking to the Scottish Retail Consortium, FDF Scotland, the hospitality association and local authorities about the introduction of that. That would be a major step forward in terms of being able to provide more security in the funding of the system.

We are also doing things such as looking at the competence requirement. We are looking at introducing a new digital system and using greater sampling, surveillance and third-party assurance as part of the overall assurance system. The industry does loads of testing. There is certainly more opportunity in terms of looking at things such as the New Zealand model. Using industry data but having the regulator doing assurance checks in terms of the quality of that system is definitely a way to go in terms of not duplicating what has already been done but using their information and evidence to support us.

Q449 **Chair:** What sort of thing are you anticipating charging for in the future?

Geoff Ogle: We are looking at an annual registration fee for Scottish businesses that come under local authority control. The idea would be an annual registration, and with that there is a fee. Any enforcement-type activity would be separate to that. Businesses that are poorly compliant would then pay for their poor compliance. Rather than build poor compliance into the overall cost, we are taking it out. We still need to work through what the charging model will be and how it will operate, but we are intending to work with Scotland Food and Drink to help us develop what the charging model options might be.



Katie Pettifer: This is an area that we have started to explore with local authorities in England, Wales and Northern Ireland as well. We put a paper to our board on it earlier this year. Geoff is much further ahead in his thinking. We are conscious that it is a really difficult issue. No one wants to put more costs on businesses.

Q450 **Chair:** We have come full circle. You were talking at the start, Katie, about the contribution of the sector to growth. Putting another cost on to the companies that are working in this area will not necessarily help them develop and grow their business, will it?

Geoff Ogle: That is where the balance is in terms of cost. We still think that because we are the central competent authority, we should still get some money from the Scottish Government for some of our functions. If you talk to retailers, for example, one of their frustrations is that effectively they have potentially 32 different interpretations of the law in their stores.

Katie Pettifer: Or 300.

Geoff Ogle: Or 300 for you. If you are changing the system and using third-party assurance, we are making an assessment of their audit system and verifying against that, and it is enabling local authorities to direct resource at where the greater risk is. There are benefits in terms of our proposal for large sections of industry in that some of that regulatory burden would be removed.

Chair: We are into fascinating territory here—arguments that lead to centralisation always are—but we are out of time for today, so we will save that for another occasion. Can I thank you both for your evidence? It has been enormously helpful to the Committee. It is apparent that we have two public bodies here that are working very effectively together cross-border in this four-nation approach, which is enormously encouraging to see. It allows you to keep that focus on outcomes for consumers and for public health, which surely, at the end of the day, is what this is all about. Thank you for your attendance and for your engagement. I will conclude this morning's session at that.