



# Common Frameworks Scrutiny Committee

## Corrected oral evidence: Post-Brexit common frameworks

Tuesday 25 January 2022

10.30 am

Watch the meeting

Members present: Baroness Andrews (The Chair); Lord Bruce of Bennachie; Baroness Crawley; Lord Foulkes of Cumnock; Lord Garnier; Lord Hope of Craighead; Lord Keen of Elie; Lord Murphy of Torfaen; Baroness Randerson; Baroness Redfern; Baroness Ritchie of Downpatrick; Lord Thomas of Cwmgiedd.

Evidence Session No. 20

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Questions 256 - 268

### Witness

[I](#): Danny Jeyasingam, Deputy Director, Devolution Team, Department for Environment, Food and Rural Affairs.

## Examination of witness

Danny Jeyasingam.

Q256 **The Chair:** Good morning, committee, and good morning to our witness this morning, Danny Jeyasingam, the deputy director of the devolution team at the Department for Environment, Food and Rural Affairs. This is the Common Frameworks Committee and our 20th oral session. Danny has come to talk us through some of the issues arising from the outstanding Defra frameworks. We are very grateful to you for that, Danny, because we understand that it is not that usual for officials to talk directly to a Select Committee, but in this instance it is you with whom we want to have a conversation. The Common Frameworks Committee has to have a delayed timetable on common frameworks for a number of different areas, and we will discuss some of those with you.

Defra has such a large role in the formulation of frameworks—I think there were 20 altogether—and we are very anxious that we use the time we have left as wisely as possible to scrutinise the frameworks that are the most important and the most complex and that will require our fullest attention. One question for you today before we can see those frameworks, which you are still working on, is how you can steer and guide us to which frameworks we should pay particular attention.

In that conversation, we will touch on all the issues that go into the making of the frameworks, some of which have held up the framework development, some of the external issues, some of the issues to do with the relationships with Northern Ireland and the Republic of Ireland, and any explanations that you have about the interactions with external issues and legislation. We have a full set of questions, and I hope you will find them interesting and helpful as we go through our procedures. As I say, we absolutely understand that you are an official and we will respect that completely.

I will start with a very general question. Can you give us a brief overview of the department's portfolio of frameworks? Can you indicate to us whether you are grouping the frameworks in some way that enables us to see a batch of frameworks that hang together? That will give us a mental map of what to expect in the coming weeks. Thank you very much.

**Danny Jeyasingam:** Thank you, Chair. I am very happy to be back in front of the committee with as many questions as we can get through.

There are 14 common frameworks in the Defra portfolio and they share a lot of common themes. They all build on long-standing arrangements between the UK's Administrations. They are used to seek decisions by consensus to try to avoid any unnecessary regulatory fragmentation while recognising devolved competence and existing divergence. They all propose governance, decision-making and dispute resolution arrangements to facilitate joint decision-making in the areas where we have agreed that commonality is necessary, such as protecting biosecurity or fulfilling international obligations.

The 14 frameworks cover almost the entirety of Defra's portfolio, and you could probably group them in a couple of ways. My own way would be to group them in three broad categories, starting with biosecurity and, under that heading, looking at the animal health and welfare and plant health frameworks. There are a lot of common issues, which I can go into during the session today, and it makes sense to badge those under biosecurity.

The second heading is environmental regulations, covering air quality, best available techniques for dealing with industrial emissions, ozone-depleting substances and fluorine gases, resource and waste, and chemicals and pesticides. That is quite a big group.

The third category is food and farming. It is quite broad, but under that heading I would look at food compositional standards and labelling, agricultural support, fertiliser regulations, organic production, zotech, plant varieties and seeds, and fisheries management and support.

There are different ways in which you could group them. Biosecurity makes obvious sense. The others you might look at as more stand-alone. Broadly, however, there is enough commonality in those three headings that, for the lines of inquiry you would take, it would make sense to look at them in those sorts of batches. That is how I would group them.

As a slight alternative, depending on how you wish to spend your time, you could look at the themes that run across all 14 of the areas. Dispute resolution is one of the areas and one that stakeholders are most interested in. That could be one theme to look at, and that would touch on all 14, but that could be a bit harder to manage, because getting officials in to talk to each of those frameworks might be difficult. I suggest that those are the three headings that would be most effective for your scrutiny.

**The Chair:** That taxonomy is extremely helpful, and the most helpful that you could give us. It is important for us to understand the content of the frameworks and the way they overlap and co-exist together, because that will tell us which other departments you might have been involved with, which other countries of the UK would have greater interest, and so on. These are the questions that I think my colleagues will ask now. I will leave it there, because that is exactly the architecture that I hoped we would have clear at the beginning.

Q257 **Baroness Crawley:** Good morning, Danny, and thank you very much for being with us again and giving us your time. We appreciate it.

You have very helpfully given us the three broad groups. Are there any frameworks in those groups that you would highlight as particularly complex, distinctive or impactful? The Defra frameworks, bar two, have been a bit like an unreliable boyfriend: you never know where they are, what they are doing or whether they will turn up on time. We have very little time now in this committee because of the Northern Ireland elections coming up and things closing down politically in Northern

Ireland at the end of March, so our mandate is very tight now and we have to prioritise what we will scrutinise and whether that scrutiny will be worth while. It would help us to know what the most impactful common frameworks of those groups are.

**Danny Jeyasingam:** Let us do this in two ways. The frameworks I would highlight as the most impactful are the animal health and welfare and the plant health frameworks, which fall under the biosecurity heading. They are particularly complex, largely because of their interaction with international obligations; the trade angle is quite interesting. They also intersect with the United Kingdom Internal Market Act and the Northern Ireland protocol.

Other frameworks are in a similar position in hitting all those criteria, but the biosecurity area has an interesting mix of complicated policy and operational issues and crisis management. Within all the frameworks I have mentioned we have dispute resolution, and advance notification of policy issues and concerns, but the biosecurity ones have that mix where you can see the governance as it operates daily but you can also test what would happen in the event of a crisis—for example, if there was an animal disease outbreak. It would be quite interesting for the committee to see how you would ramp up the governance arrangements if there was a disease outbreak versus the more routine animal health or plant health decisions. I suggest those two as an interesting place to start.

I would also look at fisheries. Again, that is a complex and totemic policy area. I find it interesting, because it is an area where there is excellent collaboration across the UK. There is a big political backdrop, because fisheries is such a totemic and sensitive issue. There are international trade negotiations at play, but there are also the domestic negotiations on quota management. That gives you an interesting perspective of the domestic and the international negotiations, and because of the political and other sensitivities in that area it is interesting to look at how the governance in place has to bear the weight of all those different pressures.

I suggest those three, but in an effort to be a more reliable boyfriend I would cover only biosecurity and food and farming. There is an interesting mix under environmental regulations. Air quality is an interesting policy area, because again there is lots of collaboration, and there are lots of international obligations in place there. That would be quite an interesting one to look at, particularly in the context of the other frameworks that you are looking at. That spread, from fisheries and animal health and welfare to plant health and air quality, would give you a decent look across all Defra's portfolios. Is that helpful?

**Baroness Crawley:** That is extremely helpful. Thank you very much, Danny. I will leave it there.

**The Chair:** Can I pick up on one question? On the biosecurity area and the incredible importance of developing knowledge on pathogens and so on, which is a global issue, were there times when you thought that this

was too complex to be fitted into a common framework? Does it test the concept of a common framework to its very limits?

**Danny Jeyasingam:** Yes, it does, but I never thought that it was too big for the framework area. That is probably true of all the frameworks as you get into the detail of them and see what is at their heart. I always think of the frameworks as being broken down into three areas. There is what I call advance notification; that is not an official term. There is bringing an issue into the room, raising it to the awareness of other Administrations, bringing it to people's attention; it could be an international issue, a domestic issue, an issue that is in the news or an issue that a parliamentarian has written to the department about.

Then there is the middle phase, which is where the bulk of the framework is. It is all the governance, the decision-making apparatus and the procedures for having an informed debate about the issue: how you exchange data, when you brief Ministers, who is deciding what on each issue. In our context, it is how you bring it together if you have decision-makers from the four Administrations.

The third element is dispute resolution. If you cannot agree at the second stage, what do you do to manage those disputes?

So, yes, the frameworks are tested, particularly the more complex they are—you can see with each of the headings I used how the pressure builds up—but I have never thought that they were not big enough to cope. I think that over time, over years, we will want to iterate them and we will learn and say, "This worked really well in the crisis management phase, but when an issue felt like a business-as-usual policy issue, we realised too late in the day that it was going to go wrong. How can we strengthen the framework?" I have never felt that they were too big, but I do think that they will need to be iterated over the coming years.

**The Chair:** It is so interesting for us to hear that, because the making of the frameworks is a bit of a closed process to us. As you have been working through this, now that you are in this process have you ever felt with other frameworks that were excluded for various reasons that in fact "We should have pushed harder for a framework on this"?

**Danny Jeyasingam:** No, I have not. There are times throughout the process—I am sure that later we will go through the six years that we have been working on this—where we have stress-tested it and said, "Are you sure that we don't need a framework here?", but I have always been reassured that there are existing arrangements in place and it has not been necessary to goldplate them with a common framework because the arrangements are working very well.

To be completely frank, what I have felt the most is, "I wish we could get these over the line and out there, scrutinised and in place". We are operating them, but there is a difference between operating them as we are now and operating them when they are fully transparent, out in the public domain, being scrutinised and reported on. It is only at that stage

that you start to look at a framework and say, "This is a robust framework, but—".

As excellent as my counterparts across the UK and my team are, there are some things that you will not spot until you are live running and in a crisis and you realise, "We should have had that in the framework". I suspect that if you ask me that question again in a couple of years' time I might look back and say, "That's an area where, if we'd had a framework, that might have resolved it". But I suspect that if we had any more frameworks, it would have made the scrutiny process even more treacle-like.

**The Chair:** I completely sympathise. That is very important for us to hear about iteration going forward. Again, that is extremely helpful.

Q258 **Baroness Redfern:** Thank you, Danny, for speaking with us today. I will refer first to the statement on joint fisheries, which you have already mentioned contains complex issues. The fisheries statement incorporates many policies and addresses our fishing industry, helping it to thrive as well as supporting our coastal communities, which we know are very dependent on a healthy marine environment. We are very interested to hear your views on the purpose of the framework outline agreement in contributing to the objective of the wider fisheries management and support framework.

**Danny Jeyasingam:** In answering that question, I will explain very briefly what the framework outline agreements are. They all serve the same sort of purpose at heart, which is to set at a reasonably high level the scope of the framework, the breakdown of the policy area that requires common approaches, the current arrangements in place and the legal and technical definitions, the retained EU law, domestic legislation and international obligations at play in that policy area and all the relevant technical definitions.

The second half of the FOA sets out the operational details: how decisions are made in that area; the roles and responsibilities, not just of officials and Ministers but of agencies, regulators and so on; and the difference across the UK for each Administration. It is also about how implementation of the framework will be monitored and the arrangements for resolving disputes. That is what the FOA does for each of the different policy areas.

The FOA will be part of the whole framework for fisheries. It sits alongside the Fisheries Act, the concordat and the joint fisheries statement. The way I think about it is that you have the FOA that sets out the scope and high-level arrangements of the framework. Then you have a concordat that sets out all the governance and ways of working in much more granular detail. You have the legal underpinning provided by the Fisheries Act, and then you have the joint fisheries statement that sets out what I refer to as a strategic policy framework for the ambition you mentioned of having world-class management of the UK's fisheries. I view it as a package.

Being completely frank, when you look at these documents you will see some repetition. You will see dispute resolution referred to in the FOA and you will see similar language in the concordat. That is unavoidable, because one is high level and one is more granular. My own preference is that in future the concordat is the main bit of the framework that explains everything, and that is what I focus on.

There is a collective view with other departments and the devolved Administrations that for reasons of transparency it makes sense to publish the FOA that we have been working on alongside all the other documentation, but if you had scrutinised this last year, as we had hoped, we probably would be taking those FOAs out and saying, "Here is a concordat that's the heart of the framework". It adds to the objectives that you have asked about as part of that package, but we will probably not need it as much in future once scrutiny is completed.

**Baroness Redfern:** As you say, at the moment it is very complex and there are many issues running through that concordat and so on.

**Danny Jeyasingam:** Absolutely. I think the FOA does a good job. Flicking through that document, which is quite detailed, you get a good overview of what the framework is all about.

**Baroness Redfern:** Yes. Thank you, Danny.

Q259 **Lord Garnier:** Thank you for coming, Danny. You have skated around the area that I want to discuss with you in your answers to Lady Redfern and Lady Andrews, which is the absence of any documents for us to look at. When the Secretary of State came before the committee in September, he said that one of the reasons for the delays in producing these documents was what he called cross-cutting issues, a fascinating phrase. We hoped to get them by December. I gather that we may not even get them until next month, and we have been waiting and waiting. Can you give us any firm commitment about when the provisional documents will be in front of us for scrutiny?

**Danny Jeyasingam:** Yes, I can. I certainly recognise the frustration, which we have felt too. I think I mentioned when first joined the call that the main issue of last year was trying to resolve the standard text on the UK internal market, references to the Northern Ireland protocol and international relations. At every stage of the framework development we prioritised the four-nation agreement, and it was only towards the end of last year—November, December—that we got ministerial agreement between the Cabinet Office Ministers and their devolved Administration or constitution counterparts to the approach to cross-cutting issues. It has taken a bit of time for the policy team to make sure that it fits the vagaries of each individual framework. Towards the end of last year, unfortunately the rise of the new Covid variant took a lot of policy resource and ministerial time. It was diverted back to that, hence the delays.

I am pleased to say that we have received four-nation clearance for nine of the 14 frameworks, which we have now confirmed will be published on 3 February, so very early next month. I can mention which ones. The nine are animal health and welfare, plant health, air quality, best available techniques, chemicals and pesticides, agricultural support, fertiliser regulations, organic production, plant variety and seeds, and fisheries management and support. Sorry, not fisheries management and support. I think we are waiting for another Administration to come through on that one.

The other ones are going through the clearance process, and we hope that we will have those in the coming days. As soon as we do, we will be able to confirm those dates with you, but I hope that the nine that I have outlined will enable you to receive the documentation and start to do the detailed scrutiny that you are keen to do.

**Lord Garnier:** We are. I am grateful to you for telling us that nine will be here on 3 February, but we do not have much time, do we? If these are as complicated as they appear to be, they may need quite careful consideration by the committee. Is there any way you can engender urgency for the remaining five?

**Danny Jeyasingam:** Absolutely, yes. We have a meeting of our interministerial group next Monday, where officials will provide an update, and if there are any remaining clearance issues at that point I will endeavour to unlock them. I hope that will allow us to publish the remaining frameworks. If there are any issues at that point that we are still working through via the clearance, they are probably quite knotty one where we need to work out exactly why there is particular concern about an individual framework.

I hope that we are getting towards the light at the end of the tunnel, because you can see that those I have listed cover very complex areas. We have been able to clear or get four-nation agreement to the biosecurity ones that I mentioned, and we hope that we will be able to get similar agreement on the others. The nine I mentioned will be published on 3 February, and I hope that the others will be published soon after.

**Lord Garnier:** Well, let us keep our fingers crossed, as we have for the last 12 months, and let us also hope that the light at the end of the tunnel is not the light of the approaching train. Thank you very much.

Q260 **Lord Murphy of Torfaen:** My question is about Northern Ireland and what happens if the Assembly and the institutions collapse before the elections. I hope they will not, but you never know in Northern Ireland. What is certain, of course, is that there are elections in Northern Ireland and the period of purdah starts weeks before the elections themselves. The time for Northern Ireland is very limited and, as you know better than anybody, these frameworks require the agreement of four Governments. Is there a contingency plan in your department in case there is not enough time to agree final versions of these frameworks



before any of that happens?

**Danny Jeyasingam:** It is a great question. We talked about this briefly across the four Administrations yesterday to make sure that we are all on the same page, and we will do a bit more detailed work on this over the coming days and weeks.

Broadly, as you say, we prioritise implementing and developing frameworks on a four-nation basis. If the final frameworks are not agreed, we have always had a contingency way back from when we started common frameworks, when we were in the throes of a potential no-deal Brexit scenario. We have always taken a point in time for frameworks and reached agreement that these are the frameworks that will be operated unless or until they are replaced or Ministers come together to agree that there will be a change. We have the provisional frameworks that were agreed at the end of 2020, which are still in place at the moment.

If we get to the scenario that you have described, my view—I think it is one that officials across the UK share—is that it makes more sense at that point to update the provisional framework status with the new versions that have just been cleared, so we are not running with the December 2020 versions but are now running with the February or March 2022 versions. That allows officials, agencies, regulators and Ministers to understand that there are frameworks in place that they are operating under.

It is obviously not an ideal situation, because it will be another delay before we can get them finalised, but while discussions in Northern Ireland are ongoing and the politics are at play, officials will be looking at the frameworks that we have agreed and operating them. There is still technical work that we could do, because once we are operating them there are still things we could look at. If scrutiny and stakeholder engagement have taken place here, I anticipate feedback coming in that would allow us to start to discuss what changes or enhancements to the frameworks would look like.

I cannot say what we would do if the Northern Ireland Executive do not return for a prolonged period. We would need to do more detailed work on that. Looking back to January 2017, I think it was, when the Northern Ireland Executive fell, during that period we were just starting the technical work on common frameworks. It was quite hard going then anyway for a variety of reasons. At that stage, my counterparts in DAERA were participating in the discussions, but because they had no Ministers in place they were not able to engage on future policy.

At that point, we brigaded the work into all the technical things that we could do as officials without necessarily needing to go back to Ministers. We were able to baseline all the EU regulations and quantify where existing divergence took place and how that operated, so there was still a huge amount we could do. Before the Executive returned a few years later we were able to make some progress, working with Northern Ireland

Office colleagues, the Executive Office in Northern Ireland, in the bounds of working without Ministers in Northern Ireland.

It is not ideal. Obviously, we want Ministers there and the frameworks depend on Ministers being able to take decisions, but we would not lock the frameworks away and have a complete vacuum. We would still be able to do something, but not as much as we would like to. I hope that helps to clarify that.

**Lord Murphy of Torfaen:** That is very useful. I do not think there is anything else you can do other than what you have described to us. As you rightly say, you have had some experience of dealing only with officials in Northern Ireland, which helps. Let us hope you will not have to do that again and that there will be Ministers and things will be normal, but thanks very much indeed.

**The Chair:** Thank you, Lord Murphy. It is a very important question, because it reflects on where Parliament fits into all this and how we get some form of accountability in place during this period. It is very challenging indeed. Thank you, Danny. That is very helpful.

Q261 **Lord Thomas of Cwmgiedd:** Danny, thank you very much for coming. Can I ask you about the relationship between the agricultural support framework, which you tell us should be available on 3 February, and the Subsidy Control Bill? How do the two interrelate? We are in the dark, because we have not seen the framework.

**Danny Jeyasingam:** I am happy to answer the question, not on the politics but on areas that—

**Lord Thomas of Cwmgiedd:** You obviously must stay away from the politics, but can you tell us how it works?

**Danny Jeyasingam:** I will do my best to answer. I consider that the Subsidy Control Bill will provide an overarching framework, the regime across the UK that will regulate all subsidies, and one of those subsidies will be agriculture. The agriculture support framework will govern how agricultural subsidies are managed across the UK in that overarching framework. To my mind, the two are complementary. I do not want to keep using the word “framework”, but I think of it in that way.

Subsidy control is the overarching framework, and agricultural support, and indeed fisheries spending and any subsidies there, will be managed in that overarching framework. The agricultural support framework will enable any policy proposals to be discussed and any areas of disagreement to be resolved. I hope that will help to ensure that any subsidies that are paid out in any part of the UK are compatible with the overarching Subsidy Control Bill. The Bill is seeking to minimise risks of distortions to UK competition and investment and ensure that there is consistency across the different sectors.

I see the two as complementary. I hope that way of conceptualising will explain how the two fit together. Does that help?

Q262 **Lord Thomas of Cwmgiedd:** To a degree, yes. I do not want to ask you too many questions about it, because it is not terribly fair to you and we have not seen the document, but I will ask one question. Obviously, the whole purpose of the Bill is to make certain that subsidy decisions are made by independent bodies, the CMA and the CAT. How is it anticipated that what is agreed politically under the framework relates to the enforceable legal obligations that can be brought by people other than government?

**Danny Jeyasingam:** I might have to get back to you on that one.

**Lord Thomas of Cwmgiedd:** I have heard of the Osmotherly rules and I do not want to take you down an area of what is possibly acute political difference, but it would be very helpful to us if you could get back to us and explain how the two interrelate in a manner that the department is happy with and to see how the framework and the Bill relate.

**Danny Jeyasingam:** I am happy to take that one away. Broadly, the way I conceptualise it is that they all complement each other at a strategic level.

I am happy to get back to you on the point about how individual subsidy decisions taken by each Administration are brought together in the agricultural support framework and how that interacts with the different agencies—the CMA and any other agencies—involved. I hope that when you see the document next week that will answer some of the detail, but there may be more questions that you want to come back with that we can wrap up together.

**Lord Thomas of Cwmgiedd:** There are two things. This obviously applies to fisheries as well. The consultation on the fisheries statement has one line about financial support, which does not explain how it is to work. Secondly, there could easily be disagreement between hill farmers in one part of the UK and people farming sheep on ordinary land, good agricultural land. How will you differentiate the areas that can receive special subsidies? Is that in the framework?

**Danny Jeyasingam:** We went through a lot of the detail when we developed the agricultural support framework. Thinking back to the summer of 2017, if my memory serves me, when we first started looking at this those were the sorts of issues that we were trying to grapple with, starting with the position of how we manage subsidies in a common way while recognising, in the way you have just outlined, that there are different types of farmers with different farmland across the UK and that agriculture is a fully devolved policy area.

We went through that to try to make sure that the arrangements in the framework recognised that there are differences like that. We had economists and others during those discussions looking at the fact that just because there is a different funding regime or a different scheme does not automatically mean that there will be distortion in the

divergence. The sort of processes for addressing some of those issues will be covered in the framework.

**Lord Thomas of Cwmgiedd:** Thank you very much indeed. We will be very interested to hear from you as soon as possible.

**The Chair:** Thank you, Danny. That will be exceptionally helpful for many different reasons. Moving on to something different, Lady Ritchie has a question.

Q263 **Baroness Ritchie of Downpatrick:** Danny, you are very welcome. I want to concentrate on two different aspects to do with Northern Ireland. Did consultation exist with the Irish Government and Irish Government officials on frameworks that particularly impacted them? We have received evidence from academics at Queen's University Belfast that suggests that that is not the case.

In that respect, it is worrying, since Defra frameworks inevitably cover areas that require co-operation throughout the island of Ireland because the border does not stop at land or livestock. In fact, farms can straddle both sides of the border; I can think of water quality, air quality or approaches to livestock endemics. Can you clarify for us whether any Irish officials have been or will be consulted and, if not, why not?

**Danny Jeyasingam:** Yes, I am happy to clarify that. I am not aware of any specific engagement with Irish Government officials as part of the framework development process. I will explain a bit more about that.

Ordinarily, as part of the programme I would expect Cabinet Office and Northern Ireland Office colleagues to provide guidance on, and potentially lead engagement with, the Irish Government if necessary. My own view is that as these documents are a focus on the internal administrative arrangements between the UK Administrations, the Cabinet Office and the Northern Ireland Office, we did not conduct any specific engagement of the type that you referred to. We are certainly aware of the implications for those areas of the Belfast agreement, particularly those that you have mentioned to do with north-south co-operation. From memory, I think agriculture, animal and plant health, aquaculture and marine are the key areas. Forgive me if I have forgotten any, but I think those are the key ones in the Defra space. We are aware of those.

During the framework development when we had a series of technical deep dives looking at these sorts of issues, we relied on colleagues from DAERA, and colleagues from the Executive Office in Northern Ireland attended all those discussions. We were aware that they were considering those issues and feeding them into the discussions with the Defra, Welsh Government and Scottish Government policy teams.

I recognise the point you are making, and once frameworks have been published I would be very happy to engage with the Irish Government and with any other interested Government outside the UK Administrations to discuss how the UK's administrative arrangements may interact with their own arrangements. It is probably a bit of a gap

that we would want to address once the documents are published, but I do not want the lack of direct engagement with Irish Government officials to suggest that we were not fully aware of the implications of the Belfast agreement. In fact, partly because there were no Ministers in Northern Ireland, for every policy deep dive we did on any area there were colleagues from Northern Ireland making that point: "We don't have Ministers in place. These are the bounds of what we can talk about, but you mustn't forget these very particular issues that hit the Defra space".

I hope that answers the question, but I am very happy to take that forward once we have published these documents at the next stage of consultation.

**Q264 Baroness Ritchie of Downpatrick:** I think we would appreciate taking that forward, because there are certain responsibilities—Lord Murphy will know this as somebody who was involved directly in negotiations for the Good Friday agreement—and the strand 2 issues on north-south co-operation are vital. I think it would be incumbent on us as a committee to find out whether DAERA has been liaising with the north-south officials on this particular issue in the Department of Agriculture, Food and the Marine in Dublin, as well as Danny pursuing that.

My second question relates to the protocol on Ireland and Northern Ireland. How is Defra planning to report on the amount and impact of divergence under the protocol in the frameworks and in Defra frameworks in particular?

**Danny Jeyasingam:** This is still being worked through in parallel to the development of the frameworks themselves. In the Defra space and the Defra devolved Administration governance, the long-standing governance we established, I anticipate that the Senior Officials Programme Board, which is a group I am part of with my counterparts in the other Administrations, and the interministerial group will wish to understand how divergence is being identified and addressed in each of the 14 common frameworks.

I see that as partly a role for my team and devolved Administration counterparts to bring together a coherent view across the entire programme. You can imagine a situation where in each framework they will have discussions identifying divergence, maybe due to the Northern Ireland protocol and maybe for other reasons. They will bring those together, and I see the Senior Officials Programme Board and the IMG as trying to take that coherent cumulative look across all 14.

This is one of the key cross-cutting issues that affects not just the Defra frameworks but the other frameworks, and I would expect us to work closely with DAERA colleagues, the Cabinet Office, the Northern Ireland Office and BEIS colleagues in particular to work out the most appropriate method for capturing and reporting on the impact of divergence as an entire-government view of the impacts in the way you are suggesting.

Each framework will conduct reviews of its effectiveness as it goes along, and I would be surprised if this was not part of that process. Every

framework has at least a review on its first anniversary after it is published as a formal common framework, and most frameworks after that will have a three-yearly formal review. A couple of frameworks—chemicals and pesticides, from memory—will be reviewed after six months of operation and annually after that.

As part of that review we would also look at how divergence was identified, the processes for discussing and analysing the divergence, and how that was reported to stakeholders, parliamentarians and Ministers. I would expect those elements to be part of that process, but that is still being worked on. I would be surprised if those things were not part of that process. It seems like the obvious way to do it. If you have any ideas, or if the committee wants to suggest any other ways in which we should be looking at this, I am very happy to take that on board.

**Baroness Ritchie of Downpatrick:** Thank you. That may be another area we could look at.

**The Chair:** Yes, I think so. Danny, you are prompting lots of thoughts across the committee, as you can see, about ways of looking at the frameworks and questions going forward. That is more than helpful. It has been very interesting to hear what you said about your own relationship and how the relationship with the Republic of Ireland has been managed indirectly, so we may want to follow that up as well. Thank you very much indeed.

Q265 **Baroness Randerson:** Thank you very much, Danny. I am sure you will recall that we have been very concerned about the limited amount of stakeholder engagement. In a letter to the Chair in June 2021, George Eustice described how stakeholder engagement had shaped the summary food compositional standards and labelling framework and outlined several changes that have flowed from that engagement from stakeholder feedback. Has there been further stakeholder engagement, and how widespread that has been? Has it been on every framework, or on which frameworks? Can you give us some examples of changes made to frameworks as a result of that engagement?

**Danny Jeyasingam:** There has been engagement. I share your frustration about stakeholder engagement, because you want to see the documents. My own view is that only when stakeholders have the chance to go through the detailed documentation will they fully see how the arrangements will work in practice and what some of the issues are. That is when I suspect we will get the most beneficial feedback. Most of the engagement that I have been involved in—attending different fora with industry bodies, NGOs, supermarkets and so on, and trying to explain how the frameworks operate—has been a mix of me clarifying what the framework does and does not do.

Understandably, because there has been a vacuum, stakeholders' initial assumption has been that the frameworks will set out what the future policy direction will be in a particular area. The initial questions are on chemicals and pesticides or on agricultural support, whatever it might be.

What exactly will the UK be doing in this policy area in future? We had to take a step back and explain that these are about the administrative arrangements, the governance, the procedures and the processes that will enable those discussions to take place, but that the frameworks do not set out what the new regime will look like. That is the first element of clarification of the frameworks.

My personal experience, which I think is shared with the policy teams I have spoken with, is that the key question we tend to be asked is: "What happens if Administrations disagree on an issue? We understand that this is about the governance. We understand that this is devolved. If this is about fisheries management and support, what happens if you have a disagreement with another part of the UK? How will this framework deal with that?" Then you can get into quite a technical discussion about dispute resolution, mediation, expert panels and so on. Most of the feedback has been in the form of those clarifying questions.

So far, there been no substantive changes to the frameworks as a result of that. I would be surprised if there were. I met a food producer who asked me about disputes, and I explained the answer. He said, "Who decides what the regime will be?" Then I explained for a decent amount of time how devolution works, and in this example the decision was for Scotland to take. The feedback was, "Okay, as long as there's a route for stakeholders to lobby Scottish Government Ministers, as long as it's not just a decision that will be taken in Whitehall officials who don't understand our industry, that's fine".

That is helpful feedback. I confess that we already knew that would be the view, and that is not what we were intending, but that feedback made me go back to each of the frameworks and just make sure that we were being as objective as possible and transparent in the frameworks to make it really clear about devolution and that decisions would be taken by consensus. That is my view.

Although the engagement has taken place and there are set-piece fora with stakeholders, it has not been the detailed engagement that I think is necessary. I hope that after next week, when nine of these frameworks are published, we will engage with stakeholders and say, "Here's the documentation. Have a look". I expect that once they see that we will get more feedback, but I must stress that because these are all about processes, procedures and governance arrangements rather than policy directions, I would not anticipate a huge number of substantive changes. I would welcome feedback that ensures that we have not gone down the wrong track, but I would be surprised if there was anything significant.

**Baroness Randerson:** That is incredibly helpful. Thank you very much, Danny. We fully realise that it may be difficult to engage stakeholders at first, because why would they understand the significance of the frameworks that are being set up? Do you anticipate as a result of that experience that a longer list of stakeholders will be consulted when you have the regular reviews that you set out in a previous answer?

**Danny Jeyasingam:** Yes, I would. Again, this is my personal view, but I will certainly be pushing very strongly for that. Once you have the governance arrangements in place and they are operating—I am a bit of a geek about it—there should be as much transparency there as possible. I favour going out to as many stakeholders as possible, even if their response is, “Thanks very much. We don’t not really much mind how the administration works”.

I would rather test it with them and get their views, because although these are procedures and processes, we want to make sure that we stress test them as much as possible, particularly in the early years. As I think I said earlier, most of the issues and the potential problems will come up only when we are fully live and running and when we are launching a Green Paper about a change of policy and it is a joint consultation between England and Wales but Scotland is not participating. What does that mean? We will know, and parliamentarians and Ministers will know, that we have gone through a very robust process, but a stakeholder may not realise until the point where they are trying to purchase or sell something or are trying to register in some way.

I definitely favour more widespread engagement at that point, but there is a sequence to it. Even if we had published the frameworks last year or the year before as planned, my view is that, on the first anniversary of the frameworks, when we are doing a review—this is particularly the case for the year 3 anniversary—we will have been outside the European Union for a decent slab of time, new legislation will have been passed, there will have been several elections around the UK, and there will be different political parties, we will have seen how the frameworks withstand that. Engaging with stakeholders at that point will be a much richer discussion.

**Baroness Randerson:** Thank you very much indeed.

**The Chair:** Thank you, Danny. That was incredibly useful, as Lady Randerson said, because it puts flesh on the expectations that we could have for these frameworks as living documents and the fact that, as we go forward, stakeholder engagement becomes more necessary than in the past—you used the word “necessary”—as you move from process and governance into the impact that can be seen and reflected. It is very helpful for us to have that perspective, and I think we will want to reflect on it as we go forward, especially in writing our report.

Q266 **Lord Hope of Craighead:** Thank you, Danny, for coming back to speak to us. My question is about the other important cross-cutting issue, which is the interaction between the Defra frameworks and the market access principles referred to in Sections 10 and 18 of the internal market Act. Section 10 deals with the sale of goods and Section 18 deals with the regulation of services. I imagine that Section 10 is more directly relevant to the Defra frameworks, but the broad question is: how do these frameworks interact with the opportunity to obtain exclusion from the internal market access principles where there is agreement across the Administrations?



**Danny Jeyasingam:** All the frameworks recognise the importance of the UK internal market. It is one of the original principles agreed in, I think, October 2017 at the JMC. All the frameworks are intended to facilitate discussions on internal market issues as the need arises, including on the possible need for exclusions with regard to the internal market Act. We have been working through the provisional resources and waste framework to consider possible exclusion for single-use plastics. Officials have been going through the governance to gather different views and evidence and to use that to try to work out whether an exclusion is necessary, and then what the process will be for obtaining it.

In direct answer to your question about the substance of the frameworks themselves, our view is that there is no need for the frameworks to reiterate the detailed provisions that are in the Act itself. A high-level document was published and is available online on the new process that was agreed between UK Government and the devolved Administrations on the UKIM exclusion.

Unfortunately, the new process for agreeing the exclusions from the market access principles was finalised a bit too late to be referenced in this version of the documents. Our view is that because we will be going through this scrutiny, we can take a view—we welcome your views on this as well—on whether the final frameworks should have more on the exclusion process in the documentation. That is because when you see how the documentation works and you see the processes, you will see that there is a way for technical experts to get around the table to discuss an issue, whether it is the biosecurity implications, the economic implications, the environmental outcomes. Many of those sorts of debates will have a direct impact on the UK internal market. The processes are already taking account of internal market issues.

The question for us when we take on board any more feedback that comes from scrutiny and we update the frameworks is: do we want to say more about the exclusion process? The exclusion process recognises that each of the four Administrations have their own internal processes for reaching collective agreement across Whitehall or whatever the equivalent is in Scotland, Wales and Northern Ireland. We were not proposing to have in the framework document, "Here's how it would work in England and Scotland for our internal processes". The documentation could say that if an exclusion is sought and an agreement is reached, "This is what the UK internal market Act says can take place in the form of making an SI". At this stage it was too late in the process to go back around the houses and try to insert that text. I hope that gives you enough of an indication.

**Lord Hope of Craighead:** Yes, it does, but frankly I am not clear as to why you have to wait for us and our scrutiny before you can do what the agreed process is contemplating. I just remind you of a particular provision in the document, which I think was published on 8 December last year. The chapter I am thinking of has the heading, "Proposal and consideration of exclusions". The particular kind of framework I have in

mind is agricultural health and welfare, which may have important provisions from this point of view, and the subsidy framework might also be relevant.

The chapter goes on to say that whenever any party—that is, any devolved Administration—is proposing an amendment to the schedules in areas covered by a common framework, that party “should set out the scope and rationale for the proposed exclusion” and, furthermore, that “consideration of the proposal, associated evidence and potential impact should be taken forward with the established processes, as set out in the relevant Common Framework”.

It is asking for something to be set out in the relevant framework that establishes a process that should be followed and that is to include assessment of direct and indirect economic impacts. That is the kind of provision that we would look for when we are scrutinising, because that is what the process that was agreed requires. That is why I am a bit surprised that you are waiting for us, because what needs to be set out in the framework itself is set out so clearly in the agreed process.

**Danny Jeyasingam:** I have probably not explained myself very clearly. We are not waiting for you in order to take that decision. Our view at the moment is that that text came in a bit too late to try to insert that agreed process back into the document. We were concerned not to delay the clearance process further. The process that you are describing—how officials and Ministers will come together to look at the impacts of potential divergence and regulatory fragmentation—is part of the frameworks already. The bit that we have not put in is a section that says, “UK market exclusions: here is the step-by-step process”.

At the time, we saw no need to replicate that, because it is already in the public domain and it is the way we are working as officials. The point I was making is that we are not wedded to that. I think we would add that language back in, but it just made sense because when scrutiny takes place you may make other suggestions. We may as well try to wrap them all up so that we do not have multiple versions.

We are at the stage now, after scrutiny and stakeholder engagement, where I would love for us to be able to put all the changes into the one final document. At this stage, Cabinet Office and devolved Administration colleagues think that it probably says enough, but for me it is an open question. Once you have had a look and once we have gone through the scrutiny, we may decide that it makes sense to add that in. Does that help to clarify?

**Lord Hope of Craighead:** Yes. I see a lot of sense in what you are saying. I do understand that this came rather late for you to refine the thing in a proper manner. I think we would also agree that multiple different approaches would be highly undesirable. What we look for is uniformity across the frameworks. That has been part of the theme in our scrutiny.

Do I take from what you are saying that you take the point that, as the

wording of the exclusion is so specific when it says "as set out in the relevant framework", you need something there and would react favourably to recommendations from our scrutiny so that this can be updated before the framework is finalised?

**Danny Jeyasingam:** Yes, I am very happy with that. Just to reiterate the point, all the frameworks recognise that interaction. If there is anything we can do to make that clearer to you, stakeholders and other Governments looking at these, we are very happy to take that on board.

I mentioned the single-use plastics example just to illustrate that we are going through that process at the moment. The process is being followed, and the step that you describe of looking at the economic issues, trade flows and so on has all been part of what officials have been doing, so that process is operating as described in the various steps. If there is anything we can do to make that clearer in the document, we would be very happy to look at that recommendation.

**Lord Hope of Craighead:** The point in favour of clarity, frankly, is that, without operating Section 10 in the exercise of the discretion that is set out, the internal market Act itself is a complete straitjacket, a fetter, on any divergence at all. That is the problem. The principles cut across any idea or possibility of exclusion right across the board. That has always worried us. We have this ability, through the Act, to obtain a ministerial exercise of discretion, but if it is to be exercised, clarity is vital. I hope you understand that point and will take it forward when the time comes.

**Danny Jeyasingam:** Thanks, Lord Hope, I absolutely understand the point.

**Lord Hope of Craighead:** Thank you very much indeed.

**The Chair:** Thank you. That was a very important exchange, and I think the committee would like to think about how best we can assist you in that respect, Danny, because it is essential that that is included in the text. That has been our understanding.

Q267 **Lord Bruce of Bennachie:** Yes. That was very interesting. I think Lord Hope is too modest to say that these changes to the Bill had a lot to do with him. I think he has also made the point about the straitjacket.

Danny, thank you for all your answers. You mentioned the single-use plastics issue and that you were looking at it, and I wondered whether I could tease it out a bit more. The Scottish Government have already acted on single-use plastics, and the measure comes into effect on 1 June. Is that a legacy issue, in which case it would inform the Welsh decision, or are they two separate issues? Could you explain how they both interact and how it works through?

Picking up Lord Hope's point, having looked at the specifics of single-use plastics, surely over time there will be other issues. When the restrictions were being debated, I think Chloe Smith said she thought that it would be very rarely used. It seems to us that it would be used more often than that, but perhaps you could talk us through single-use plastics and the

Scottish and Welsh examples and show how it could become, as Lord Hope is hoping, the basis that enables all the relevant partners to know how the process works so that not everything has to be reinvented each time a potential issue comes up.

**Danny Jeyasingam:** It is an excellent question. I think we are experiencing a bit of that at the moment with the first formal exclusion request under the provisions in the Act. I sort of hinted in earlier answers that going through a process for the first time always taking longer. However well we write it on paper, it always takes longer in real life when you are first engaging with officials and trying to understand the processes.

In answer to the question, "Are single-use plastics a legacy issue?", in some ways they are, because my understanding is that the Scottish Government proposed this legislation pre-pandemic and delayed passing the regulation because Covid hit. At that time, as we all know, lots of other things were going on. If it had gone through pre the UK internal market Act, it would have gone through and it would not have been subject to the market access principles. So it is a legacy issue in that respect, but it is new in the respect that because it was introduced in the Scottish Parliament in 2021 it falls within the scope of the market access principles.

The Scottish Government have proposed an exclusion for this area. It is important to stress why, apart from it being the first, this one feels like an interesting case in point. It is one of those areas where although the Scottish Government have moved a bit faster, which is in their gift, and their ban comes into force this June, the policy direction is shared by the UK Government, and indeed the Welsh Government, so we are looking to make similar bans and are all consulting on that. This is not a question of regulatory divergence or fragmentation because Ministers are taking different policy choices. This is broadly just a question of timing.

We have tried at official level, before we agree that an exclusion is necessary, to look at the process via the framework. The resource and waste common framework group of officials has met very regularly to work out the different timings of respective legislation. They have been exploring whether there is potential for aligning on timing so that the ban can come into force in a coherent way at the same time across GB. So the proposal for an exclusion first goes through those stages.

Where timings look difficult to align, we have a discussion at our interministerial group. We had a discussion in December, which shows you how it went from a technical level to my level with my counterparts. Our job then was just to make sure the process was being followed. Had there been the relevant exchange of data? Were we satisfied that the framework was facilitating the right discussions? Then it went to Ministers, who had a good, frank discussion about exclusions and the fact that different Administrations wanted to do almost the same thing but just at different times, and whether there was any way in which we could find to bring that back together. That happened just before Christmas.

Over the Christmas period, officials looked at that very question: was it possible to align? At this stage, the formal request from the Scottish Government for an exclusion is still there. It is still being looked at in line with the process that Lord Hope referenced a moment ago. The next discussion on that will take place at ministerial level in a couple of weeks.

That is probably as much as I can say about that. It is still being looked at, it has gone through that full process, but it is unique in that way. I want to stress that point. This is not about policy divergence in those terms; it is just a question of whether there is any way we can find an approach that allows us to align the ban. If not, what are the implications? What does it mean with regard to the market access principles? If an exclusion is a possibility, Ministers will need to discuss that and reach a view on it.

**Lord Bruce of Bennachie:** That is very helpful. I think what you are saying is that it does not quite take us to where we would be if, for example, one of the devolved Administrations say, "We want to test out a policy that nobody else has yet decided they want, and we want to do it by exception", or, "We have special interests that we think we should legitimately be able to protect", which I think Lord Thomas or Lord Hope mentioned in relation to livestock on the islands, for example.

At this stage, we will not be in a position to know what the process is. This particular process for single-use plastics may help, but it is not quite the full package. Will we just have to wait and see how it works out as issues arise that are completely new and fresh?

**Danny Jeyasingam:** I half agree. It is right that we will not see the full process. If it was an exclusion request for full policy divergence by one Administration, you would stress test the entire process in that way, but I do think we will see some interesting things. We are seeing some interesting things just in the process itself. If I can share a bit of the discussions, it is okay for me and others who have been steeped in common frameworks for a long time, but it is almost inevitable that a degree of the process is just explaining to people what the internal market Act means, what the market access principles mean, why there is an exclusion process and how that operates. It takes a bit of time to explain why that is there and how it meets different policy objectives, but how there are also consequences to that.

That is very valuable, because—and I hope I am not speaking out of turn—if you look at the process where we say that each Administration will need to come to their own internal view and then come together to try to reach a consensus view, that is absolutely the right process. It is the inevitable process.

To my mind, this all underlines how complicated those discussions can be. We are learning a lot from this process. Even in the initial discussions when I start to talk to people—"Look, there may be some differences of timing here"—I am not surprised if the immediate question back and the challenge is, "Why can't you just move a bit faster in England? Why can't

they move a bit slower there? Surely we can find a way to coalesce around the same date". You have to get over those sorts of hurdles and test it, because that is a legitimate objective.

We all agree that we should ban these plastics. Most citizens would wonder why, if you have agreed a sensible thing, you cannot just ban it at the same time. But trying to work with the four different systems and bring it together has been very difficult. I agree with your point. I think there is a bit of wait and see.

With all exclusions, we have always taken pains to explain that you have to look at them case by case, because there may be legitimate aims, as you have said, whether it is policy incubation or testing, and an Administration might want to go faster. It might be in all our interests to see what that looks like so that we can then decide whether to do the same or not. The exclusion process allows that, but that is slightly different from an Administration wanting potentially to allow or to ban a product that the other parts of the UK do not agree with.

I am sure you are very familiar with these UK internal market issues anyway. From my own point of view, I would say that the process is there and that with each exclusion request I think we will discover different aspects where we need to strengthen it or where it is not quite aiding the process.

Just circling back to something you asked, Lord Bruce, I have always said that it is very difficult to predict the volume of exclusions. The thing that I always fall back on is that in these 14 framework areas, with multiple changes of Ministers and Governments across the UK over the last six years, we have always gone back and stress-tested the initial assumption. Do we agree that these 14 areas are the areas where we would prioritise a common approach? Do we agree that even though we could act in four different ways it just makes more sense to tackle an animal disease outbreak in a very similar fashion?

That is the bit that I always fall back on, maybe naively, but I always think that the starting position throughout these frameworks is that we seek to operate together. I would hesitate to predict whether that has an impact on the volume exclusions, to be honest.

**Lord Bruce of Bennachie:** That was a fascinating and very helpful insight. I will not raise other issues, because it sets the kites flying, but thank you very much indeed.

Q268 **Lord Keen of Elie:** Good morning, Danny, and may I add my thanks to those of the other members of the committee for the evidence you have given this morning?

I wanted to raise an issue about structure and form. As you will be aware, about two and a half years ago the Cabinet Office produced a template for the provision of common frameworks. We have encountered instances in which departments have either been unaware of that template or have not followed it. As a consequence, that has complicated

our scrutiny of these provisional frameworks and created particular difficulties because of certain omissions.

In relation to the 14 provisional frameworks you have mentioned, and more particularly the nine that we expect to see at the beginning of February, have you applied and followed the Cabinet Office template, or are there instances in which you have departed from it? In such a case, can you explain why it may have been necessary for you to depart from such a template?

**Danny Jeyasingam:** Yes, I am happy to answer that question. I do not believe that we have departed from the structure of the template for the framework outline agreements that I described earlier. Those are the documents that set out the scope and the operational detail of the frameworks, and we followed those quite closely.

Just to clarify, I do not think it is a Cabinet Office document. I think it was agreed between the Cabinet Office and the devolved Administrations. My own recollection of it—I would love to give them credit—was that the Welsh Government, as a way to seek to break an impasse when policy officials around the country were just throwing up very good ideas about what should be in a framework, came forward saying, “Is this not a good way of brigading them? Would this not make it much easier for people who do not live and breathe frameworks to engage with these?” I just want to put that on record.

I think we followed those quite closely. The differences will be in the subsequent documents, the concordats that follow. Those are the more detailed documents that set out the ways of working in much more granular detail. Those are different, which I understand, because, if you can imagine, groups of officials are getting together around the country and working out what their ways of working should look like, and they describe it in slightly different ways. The flowcharts and the processes look slightly different sometimes, but usually for good reason.

Although those concordats have been tailored to the needs of each framework area, they tend to have a very similar structure. If you imagine, they are all addressing decision-making, roles and responsibility, governance fora, dispute resolution—basically all the things you would expect a good MoU or concordat to cover. They are all in there, but they are probably not identical in the way the FOAs are. I hope you will be able to engage with both sets of documentation quite easily, though.

**Lord Keen of Elie:** Thank you, Danny. I think we may have to clarify the origins of the template. My understanding is that the Cabinet Office did publish a document in July 2019 containing a proposed template, but I think you are suggesting that that may in turn have been derived from proposals put forward by the Welsh Government themselves.

**Danny Jeyasingam:** Entirely. I will probably get a smack from the Cabinet Office for taking credit away from it, but I recollect very vividly being in Cardiff and looking at a scrawled handwritten document saying,

“Would this structure not make sense if it looked like this?” and then a day later a Word document and shortly after a publication by the Cabinet Office. That is my recollection.

**Lord Keen of Elie:** We are grateful to have it, whatever its origins might be.

**Danny Jeyasingam:** Absolutely.

**Lord Keen of Elie:** That is very helpful. Could I come back to a point that Lord Bruce raised? You talked, for example, about hoping that the four Governments would take a common approach to issues such as animal welfare. In light of the fact that they find it difficult to take a common approach to human welfare, how optimistic are you about that?

**Danny Jeyasingam:** I am fairly optimistic about it, because the four CVOs, chief veterinary officers, have among the most in-depth collaborations that I have seen—I think fisheries runs quite close—in terms of their daily contact on these sorts of issues. I saw shared ambition to have high animal welfare standards and to prioritise animal health. I take your point about human health, though, and the difference of approaches there. In this case, in most business-as-usual decision-making, it is quite sensible to find a common approach in the EFRA spheres. If there is a difference of opinion or a different direction, usually it will not impact on the JMC principles, but you may be making a broader point about animal versus human health. I am probably not qualified to comment any further than that.

**Lord Keen of Elie:** Thank you, Danny. That is most encouraging.

**The Chair:** Thank you, Lord Keen. Thank you, Danny. The Welsh members of the committee are always pleased to know that Wales has had such a formative influence on UK-wide policy, so that is very good news about the template.

I thank you on behalf of the committee for the way you have responded to some very tough questioning. You have given us a real insight into what it has been like working on the frameworks and trying to make sure that everyone is, in fact, working apace and working on lining things up in very difficult circumstances indeed, with the landscape changing around you. We do appreciate the challenge that you have faced and the quality of the work that you have done.

We very much look forward to seeing the frameworks next week. We will take your advice and focus on the ones that you have said are more challenging, because clearly these will be the ones that have serious impacts on public health and agriculture in all sorts of ways. We are grateful for that steer. We will reserve the right, of course, to come back and ask you questions should we need to, because the situation is slightly different than the one we anticipated. As Lady Crawley said, we are now working to a deadline in Northern Ireland that is not of our making, so we will have to be extremely focused and sharp about how we do things and



we may need your help.

You have been an exemplary official in the process of all this work, and certainly we could not have asked for a better and more frank and more useful exchange this morning. Thank you very much indeed, you and your colleagues in Defra. We look forward to being in touch.