IMPACT ASSESSMENT	
Department /Agency: Agriculture, Environment and Rural Affairs & the Food Standards Agency in NI	**Title:** Impact Assessment of proposals to amend the Transmissible Spongiform Encephalopathies Regulations (Northern Ireland) 2010
Stage: Consultation stage	**Date:** February 2018
Related Publications:	

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Title of Proposal - Consultation on proposed amendments to the Transmissible Spongiform Encephalopathies Regulations (Northern Ireland) 2010

What is the issue under consideration? Why is government intervention necessary?

EU measures for the prevention, control and eradication of Transmissible Spongiform Encephalopathies (TSEs) are regulated under domestic law by the TSE Regulations (NI) 2010. It is necessary to update these Regulations in accordance with recent changes to the EU TSE Legislation (Regulation (EC) 999/2001) and to reflect various policy, operational and technical changes since the TSE Regulations came into operation in December 2010.

What are the policy objectives and the intended effects?

The policy objective is to have TSE controls which maintain animal health and public health, are based on scientific advice, are proportionate to the known risk to public and animal health and are practical and enforceable. These proposed amendments will:-

(i) enable the feed industry to take advantage of an EU derogation permitting the use of pig and poultry processed animal protein (PAP) in feed for farmed fish,

(ii) clarify on-farm classical scrapie controls,

(iii) remove requirement for restrictions on the movement of sheep and goats on holdings affected by atypical scrapie,

(iv) remove the unnecessary requirement for abattoirs slaughtering cattle that require BSE testing to have a Required Method of Operation (RMOP),

(v) provide a statutory mechanism by which food business operators can apply for approval to use an alternative method of spinal cord removal, other than carcase splitting, for sheep and goats over 12 months of age,

(vi) amend the list of tissues from cattle that are designated Specified Risk Material (SRM) to reflect changes to EU legislation,

(vii) provide clarification on specified risk removal from sheep in slaughterhouses,

(viii) amend the wording to permit the young lamb (YL) and young goat (YG) stamp to be applied by someone other than an ‘inspector’ as per 11 (1) of Schedule 7,

(ix) update valuation and compensation procedures for sheep and goats to align with cattle procedures,

(x) remove the requirement for written bilateral agreements to authorise the removal of processed animal protein derived from non-ruminant animals,

(xi) permit the use of meal from wild starfish and farmed aquatic invertebrates (which do not fall within the definition of 'aquatic animals') in feed for non-ruminant animals,

(xii) enable the feed industry to use processed animal protein derived from insects in feed for aquaculture,

(xiii) take advantage of an EU derogation that will permit the export of process animal protein from ruminants,

(xiv) strengthen the arrangements for an independent appeals procedure,

(xv) bring together, under one paragraph, the measures required by the veterinary inspector when a bovine is suspected with TSE and simplify enforcement action.

(xvi) achieve a more equitable sharing of costs of BSE surveillance between the farming industry and the taxpayer,

(xvii) revoke the 2010 Regulations.

1. BACKGROUND

1.1 Transmissible Spongiform Encephalopathies (TSEs) are fatal brain diseases that include Bovine Spongiform Encephalopathies (BSE) in cattle and Scrapie in sheep and goats. Exposure to BSE through the consumption of infected or contaminated meat is believed to be the primary cause of variant Creutzfeldt-Jakob Disease (vCJD) in humans.

1.2 Regulation (EC) No. 999/2001 of the European Parliament and the Council, as amended (the EU TSE Regulation) lays down rules for the prevention, control and eradication of TSEs, including BSE and Scrapie.

1.3 The Transmissible Spongiform Encephalopathies Regulations (Northern Ireland) 2010 (the Regulations), which came into force in December 2010, provide the powers necessary to administer and enforce the provisions of Regulation (EC) No.999/2001 in Northern Ireland.

1.4 Since the Regulations came into force, the EU has made a number of amendments to the EU TSE Regulation and reduced controls to reflect the reduced risk posed by BSE. These changes have been applied across the EU and have been implemented administratively in the United Kingdom pending the proposed update to domestic legislation. A number of minor amendments have also been proposed to clarify/reflect policy, operational and technical changes since the Regulations came into operation in December 2010.

1.5 The Department of Agriculture, Environment and Rural Affairs (DAERA) and the Food Standards Agency in Northern Ireland (FSA) are carrying out an eight week consultation to seek views/comments on proposals to amend the Transmissible Spongiform Encephalopathies Regulations (Northern Ireland) 2010. A number of questions are included within the consultation document.

1.6 We would like to capture any significant impacts (costs or benefits) that you may foresee as a result of the proposals and would ask that you also provide these in your response to the consultation.

2. POLICY OPTIONS

Option 1 - Do nothing - Continue to use existing legislation.

2.1 The Do nothing option has been excluded because of the need to amend and update existing legislation.

Option 2 - Amend current legislation.

2.2 The option to amend current legislation is the preferred option of the Department. This will provide the opportunity to update and replace existing domestic Regulations, which are based on scientific advice, proportionate to the risk to public and animal health and are in line with the European Commission's TSE Roadmap.

When will the policy be reviewed?

2.3 There is ongoing monitoring of the policy objective which will be reviewed during 2020/21.

3. PROPOSALS

3.1 **Amendments to feed controls:**

Following scientific advice from the European Food Safety Authority (EFSA), EU legislation permits the feeding of pig and poultry processed animal protein (PAP) to farmed fish, which came into force on 1 June 2013.

This derogation ensures that the feed industry in the UK has the same opportunities as their counterparts in other Member States for the use of pig and poultry PAP in aquaculture feed, while continuing to enforce all prohibitions on the use of meat and bone meal in ruminant feed.

Sectors affected: Feed Industry/farmed fish industry.

Costs: The option to use pig and poultry PAP in feed for aquaculture is a derogation which industry will only adopt if it is commercially viable. Companies who take up this option will be required to carry out testing to detect pig and poultry in fish feed, costing approximately £98 per consignment.

Benefits: This would enable the feed industry to take advantage of an EU derogation permitting the use of pig and poultry PAP in feed for farmed fish. There are potential cost savings if pig and poultry PAP is cheaper than the protein that is currently used by the fish feed industry. Pig and poultry PAP should provide some cost advantage to the fish feed industry, even though currently pig and poultry pap is utilised in the petfood industry. Due to the small size of the fish farmed industry here, the benefits are likely to be small.

Impact: Little impact on businesses.

3.2 **Amendments to on farm classical scrapie controls:**

In 2013 the EU TSE Regulation was rewritten in line with EFSA advice to clarify the options available following the detection of classical scrapie on a holding. It introduced the following changes to on-farm controls:

(i) Where previously farmers on affected sheep holdings under monitoring restrictions have been advised to breed from rams that are genetically resistant to classical scrapie, it now would become a legal requirement.

(ii) The existing ban on the feeding to ruminants outside the holding, of milk and milk products from animals present on the holding at the time the disease was confirmed, would be extended from the time when the possibility of BSE has been ruled out, to the end of the movement restriction period for the monitoring option, two years after the confirmation of the final case of classical scrapie on the holding.

(iii) To prevent the possible spread of infection, common grazing would be prohibited during the lambing and kidding period for animals from holdings under classical scrapie controls. Approximately 10% - 20% of sheep and goat holdings use common grazing and could be affected by this change.

Sectors affected: Sheep and goat industry.

Costs: Classical scrapie is in decline and the numbers of holdings affected per year is very small. As it is not general practice for sheep and goat milk and milk products to be sold for feeding to ruminants on other holdings, the effects of this change upon the sheep and goat industry as a whole is expected to be negligible.

To prevent the possible spread of infection, common grazing would be prohibited during the lambing and kidding period for animals from holdings under classical scrapie controls. Approximately 10% - 20% of sheep and goat holdings use common grazing and could be affected by this change.

The financial impact is not possible to quantify but it is expected that this change will be minimal.

Benefits: The options by way of derogation allows, that instead of susceptible sheep and all goats being killed and destroyed, they may be slaughtered for human consumption provided that this is within the territory of the Member State and all animals over 18 months of age at slaughter have tested negative for TSE before entering the human food chain.

Impact: The overall impact is likely to be minimal, there has not been a case of classical scrapie since 2009.

3.3 **Amendments to restrictions on the movement of sheep and goats on holdings affected by atypical scrapie:**

Current policy is that where a case of a typical scrapie is confirmed on a holding, it is placed under movement restriction and monitored for two years following detection of the last case, with no killing or destruction of sheep or goats. In light of the latest scientific advice from the European Food Standards Agency (EFSA) and the European Centre for Disease Prevention and Control (ECDC), which indicates atypical scrapie is likely to be not transmissible or have very low transmissibility, the following movement restriction on holdings affected by a-typical scrapie will be removed. Our last case of atypical scrapie was in 2014.

(i) The prohibition on movement of animals on and off the holding, other than to slaughter, during the two year period following confirmation of the last case of atypical scrapie.

(ii) The prohibition on the export to Member States or third countries of live sheep and goats, and sheep and goat semen and embryos from holdings affected by atypical scrapie, in the two year period following the confirmation of the last case of atypical scrapie.

Sectors affected: Sheep and goat industry.

Costs: Nil.

Benefits: Changes will benefit industry with the lifting of movement restrictions.

Impact: There would be a positive impact upon holdings affected by atypical scrapie with livestock being able to go to any holding without having to be identified as being from an atypical scrapie holding.

Any sheep over 18 months from the flock slaughtered will need to be tested for TSEs. It is expected that this will affect approximately one flock per year.

3.4 **BSE testing in abattoirs – Remove the Requirement for abattoirs to have a Required Method of Operation (RMOP):**

This proposal would remove the legal requirement for Food Business Operators requiring a Required Method of Operation (RMOP) because it is no longer justified; this would remove unnecessary "gold plating". Instead, abattoir operators would agree a Standard Operating Procedure (SOP) with the Department which would mirror the modified RMOP and maintain food safety and BSE controls.

Sectors affected: Food Business Operators.

Costs: There would be no cost to the Department or industry.

Benefits: There would be no benefit to industry. Abattoir operators would still need to agree a SOP with the Department which would mirror the RMOP, but this would be managed outside of domestic TSE legislation.

Impact: Nil.

3.5 **Alternative methods of spinal cord removal for sheep and goats over 12 months:**

We are proposing to include a new provision in our domestic legislation to provide the statutory mechanism by which food business operators can apply to the FSA for approval to use an alternative method of spinal cord removal for sheep and goats, should an effective alternative become available.

Splitting of the carcase would remain the default method for spinal cord removal until an alternative method is approved that is effective and safe.

Sectors affected: Meat industry.

Costs: Adoption of any alternative methods for spinal cord removal would be on a voluntary basis. As with any significant change to operating processes, there would be a cost for the business in seeking approval to use an alternative method. There would also be a cost to business from purchasing new equipment for any alternative method of spinal cord removal. However, it is expected that food business operators would consider alternative methods only where the benefits outweigh the costs.

Benefits: If an acceptable alternative method of spinal cord removal becomes available, businesses would only consider if it is more cost effective than the current method of splitting the carcase. At the present time evidence from recent trials of alternative removal methods carried out by industry suggests that there is no alternative method that would be acceptable to the meat processing industry. By changing the legislation, however, we are removing barriers for industry to develop more acceptable methods and preparing the ground so that it could be taken up rapidly by the sector if an acceptable method is developed.

Impact: No significant impact on businesses.

3.6 **Amend the list of tissues from cattle that are designated as Specified Risk Material (SRM):**

In October 2014, the European Commission presented the following two proposed amendments to Annex V of the TSE Regulations:-

(a) amend the list of tissues that are designated SRM, and
(b) to repeal the requirement for EU Member States and regions with a negligible BSE risk to remove SRM.

The change to the definition of SRM came into force on EU law on 26 May 2015 and the controls for EU Member States and regions with a negligible BSE risk status came into force on 5 August 2015. The FSA carried out a consultation with key industry stakeholders to determine the impact on them following the legislative changes. However, more information is required to ascertain how these changes may affect industry. Because of the difficulty in completing removing the mesentery, some Member States, including the UK sought advice from the European Commission on the interpretation of the legislation. The Commission has since advised that it is for individual competent authorities to decide on what is appropriate. The FSA is therefore carrying out a further risk assessment with a view of providing industry with a clearer steer.

As a consequence of the amendments described in paragraph above, certain provisions relating to the removal of specified risk material set out in Annex V to Regulation (EC) No 999/2001 have been further amended. Where the vertebral column continues to be defined as specified risk material, the European Union has modified the information to be provided on the label. As a control system, a red stripe shall be included on the label of carcases or whole cuts of carcases of bovine animals containing vertebral column, when the removal of the vertebral column is required. This amendment will also apply to products of bovine origin imported into the European Union from third countries. Annex V has also been amended so that only Member States with controlled or undetermined BSE risk are required to harvest, at the slaughterhouse, tongues of bovine animals of all ages intended for human or animal consumption by a transverse cut rostral to the lingual process of the basihyoid bone. These further changes came into force in EU law on 1 July 2017 and were implemented in the UK on an administrative basis from the same date.

Sectors affected: Meat industry, rendering industry.

Costs: No additional cost to the meat industry as a result of these changes.

Benefits: There is the potential for the industry to reduce rendering and disposal costs if the risk assessment reveals that there is no additional risk when complete removal of the mesentery is not required. There is also the potential for the meat industry to explore new food and feed markets for material previously designated as SRM.

Impact: As above, there may be a significant impact on these sectors if less rigorous removal of mesentery is accepted due to the reduced quantities of Category 1 animal by-product being sent for rendering and disposal.

3.7 **Clarification on Specified Risk material (SRM) removal in slaughterhouses:**

This proposal is to fully clarify the legislation for food business operators and remove any doubt as to the full extent of the requirement. It will make the provisions clearer for both the FSA in the enforcement of the TSE legislation and the food business operator in understanding what the legislation requires of them.

The FSA has confirmed the long standing position that, save for the permitted exceptions, all other SRM (including the spleen) is required to be removed from the carcase before post-mortem inspection.

The clarification will not introduce any changes in practice for food business operators or official control staff.

Sectors affected: Competent Authority and Food Business Operators.

Costs: Nil.

Benefits: Clarification for both the Competent Authority and Food Business Operators

Impact: Minimal impact, the proposal is making the legislative position clearer.

3.8 **Amendment to the requirements for the application of the young lamb (YL) and young goat (YG) stamp:**

Under the current requirements in Schedule 7 paragraph 11 (1) only an 'inspector' may apply the YL/YG stamp and an offence occurs under Schedule 7 paragraph 11 (3) if someone other than an inspector applies the stamp

The amendment would include the option of permitting the occupier of the premises to apply the YL/YG stamp under paragraph 11 (1).

Paragraph 11 (1) of Schedule 7 requires that the YL/YG stamp may be applied only by an 'inspector. This was introduced at a time when there were systems in place in all NI slaughterhouses approved for the slaughter of sheep for DAERA officials to examine the dentition of sheep presented for slaughter. The YL/YG stamp was applied by DAERA inspectors at the post mortem inspection point on the basis of those examinations. These examinations have for some time, been carried out by slaughterhouse staff employed by the food business operator (FBO) and these have been subsequently verified at a risk based frequency by DAERA officials. As these are primarily FBO examinations, it is necessary to include the option of permitting the occupier of the premises to apply the YL/YG stamp.

Sectors affected: Food Business Operators, Competent Authority.

Costs: No additional costs perceived.

Benefits: For the competent authority there is the potential to reduce activities at the carcase inspection point which would allow more time for post mortem inspection.

Impact: Minimal.

3.9 **Update valuation and compensation procedures for sheep and goats to align with cattle procedures:**

The TSE Regulations (Northern Ireland) 2010, (Schedule 4 paragraph 25), provide table values for sheep and goats culled due to classical scrapie. These have not changed since 2006.

This proposal would remove outdated valuation tables, which give low table values not based on current market values, and align the compensation for sheep and goats culled due to classical scrapie with that for cattle procedures.

Sectors affected: Sheep and Goat Industry.

Costs: Minimal.

Benefits: Potential benefit to industry through the removal of compensation tables which become outdated, giving low table values and is not based on current reliable market prices.

Impact: Based on the sharp decline in the incidence of classical scrapie, and the fact that monitoring controls the disease on the majority of affected holdings, we expect the impact to be minimal.

3.10 **Remove the requirement for written bilateral agreements to authorise the removal of Processed Animal Protein (PAP) derived from non-ruminant animals:**

This proposal would adopt in legislation the amendment to the EU TSE Regulation which allows industry the option of legally exporting non-ruminant PAPs and products containing such protein, without the need for a written agreement prior to their exportation.

Exports of non-ruminant PAP would remain subject to authorisation by the Department's Veterinary Service subject to conditions.

Sectors affected: Slaughter and processing plants.

Costs: Industry would continue to pay the existing test cost of £98.00 per consignment to verify the absence of cross-contamination with other animal by-products (section 3.1 above refers). This is not a new fee (fee has been in place since 2013, when we allowed pig and poultry PAP to be fed to farmed fish) and industry would only uptake this if the benefits outweighed the costs.

Benefits: There would be potential benefits to industry from this amendment if the removal of the requirement for bilateral agreements enables the negotiation of new export markets for non-ruminant PAP.

Impact: No significant impact on businesses. There may be demand to export poultry PAP or feather meal, from dedicated slaughter and processing plants however we do not expect much demand to export other non-ruminant material i.e. from pigs.

3.11 **Amendment to EU rules to extend the scope of 'aquatic animals' permitted for use in processing fishmeal and inclusion in feed for aquaculture animals:**

The EU TSE Regulation permits the use of aquatic animals in fishmeal in feed for aquaculture. Because the definition of 'aquatic animals' did not include wild starfish and farmed aquatic invertebrates other than molluscs and crustaceans, and the use of meal produced from these animals in feed for non-ruminants is not considered to represent a higher risk for the transmission of TSEs than the use of fishmeal in such feed, the EU TSE Regulation has been amended to permit the use of starfish or farmed aquatic invertebrates, other than molluscs and crustaceans, for the production of fishmeal and thereby feed for aquaculture.

This amendment came into force in EU law on 13 February 2017 and was adopted in the UK on an administrative basis on the same date.

We would ask consultees, especially those involved in the feed industry, to highlight any significant impacts, (including costs and/or benefits) that they may foresee as a result of this amendment.

Sectors affected: Feed Industry/farmed fish industry.

Costs: Not known.

Benefits: The proposal would ensure that the feed industry in the UK has the same opportunities as their counterparts in other Member States for the wild starfish and aquatic invertebrates in aquaculture feed, while continuing to enforce all prohibitions on the use of ruminant protein in ruminant feed.

Impact: Not known.

3.12 **To take advantage of an EU derogation that will permit the use of Processed Animal Protein (PAP) derived from insects in feed for aquaculture:**

The Commission has amended the EU TSE Regulation to permit the use of PAP derived from insects of certain species, reared within the EU and produced in plants dedicated exclusively to the production of products derived from farmed insects, and compound feed containing such PAP, to be authorised for feeding to aquaculture animals.

The permitted insect species should not be pathogenic or have other adverse effects on plant, animal or human health; they should not be recognised as vectors of human, animal or plant pathogens and they should not be protected or defined as invasive alien species.

We would ask consultees, especially those involved in the feed industry, to highlight any significant impacts, (including costs and/or benefits) that they may foresee as a result of this amendment.

Sectors affected: Feed Industry/farmed fish industry.

Costs: The option to use PAP derived from insects in feed for aquaculture is a derogation which industry will only adopt if it is commercially viable. Companies who take up this option will be required to carry out additional testing, costing approximately £98 per consignment.

Benefits: This would enable the feed industry to use PAP, derived from insects of certain species, to be authorised for feeding to aquaculture animals. Studies have shown that farmed insects could represent a sustainable alternative to conventional sources of animal protein for feed for non-ruminant farmed animals.

Impact: No significant impact on businesses.

3.13 **To take advantage of an EU derogation that will permit the export of Processed Animal Protein (PAP) derived from ruminants:**

The Commission has removed the prohibition on the export of PAP derived from ruminants, subject to certain conditions to ensure that the products exported do not contain meat-and-bone meal, which carries a higher BSE risk, and are not used for other purpose than those authorised by EU legislation.

Processed animal protein derived from ruminants would be transported in sealed containers directly from the producing processing plant to the point of exit from the EU via a border, in order to permit official controls. The Commission has also said it will consider the need for risk based checks on ruminant PAP leaving the EU.

We would ask consultees, especially those involved in the rendering/feed industry, to highlight any significant impacts, (including costs and/or benefits) that they may foresee as a result of this amendment.

Sectors affected: Rendering Industry/feed Industry.

Costs: Not known.

Benefits: Not known.

Impact: Not known.

3.14 **Appeals Procedure:**

The Examiner of Statutory Rules had queried the Department's legislative independent appeals procedures and the need to include an independent appeals process. In response to his comments, the Department has decided to clarify and strengthen the arrangements for an independent appeals procedure and propose including a new paragraph under existing Regulation 10, which will state:-

"*A person who is aggrieved by the final determination of the Department under paragraph (5) may, within 21 days of the notification of the determination, appeal against that determination to a court of summary jurisdiction*".

Sectors affected: Industry Operators.

Costs: Minimal.

Benefits: Potential benefit to industry which will widen the scope for any appeals procedure.

Impact: Minimal.

3.15 **Schedule 3 – Paragraph 3 Slaughter of a Suspect Animal – Re-Instatement of paragraph:**

The Department proposes to re-instate the paragraph below into Schedule 3, paragraph 3 (1)5 which had been inadvertently taken out when amendments were made to the TSE Regulations (NI) 2008. This will bring together, under one paragraph, the measures required by the veterinary inspector when a bovine is suspected with TSE and simplify enforcement action.

3.- (1)(5) If the animal to which sub-paragraph (1) applies is not killed immediately, the keeper must dispose of its milk in such a way that it cannot be consumed by a human or an animal other than its own calf or an animal kept for research purposes and any contravention of this sub-paragraph is an offence.

Sectors affected: Competent Authority.

Costs: There would be no cost to the Department or industry.

Benefits: Consolidate and simplify measures required for veterinary inspectors.

Impact: Minimal.

3.16 **Share the cost of BSE sampling of fallen stock cattle between the farming industry and the taxpayer:**

Currently the Department pays approved TSE Sampling site operators £6.50 for each brain stem sample taken. The Department also pays the cost of transporting the samples to the approved testing laboratory and for the testing itself. We propose to cease paying the TSE Sampling site operators the £6.50. This will achieve a more equitable sharing of the cost of the BSE surveillance between the farming industry and the Department by distributing the costs of taking fallen stock samples to those who receive and benefit from the programme, while continuing to safeguard public and animal health in a proportionate way.

Sectors affected: TSE sampling sites/cattle farming Industry.

Costs: The current cost to the Department is £6.50 per sample. TSE sampling sites may absorb this cost or charge farm businesses this amount for carrying out the service (i.e. removing the brain stem sample before sending it to the testing laboratory) within the collection/disposal charge for the animal. It is estimated the number of fallen animals in the 2018/19 financial year will be 22,000 with the total annual cost to the farming industry of £143,000 (£6.50 per fallen animal). If the TSE sampling site operators pass this cost onto farm businesses, the actual cost per holding would depend upon its number of fallen cattle aged over 48 months that die on farm each year.

Benefits: A more equitable sharing of the cost of BSE surveillance between the farming Industry and the taxpayer.

Impact: There could be a small financial impact on farmers, who may be expected to pay the £6.50 sampling cost per fallen animal that require BSE testing.

4. BENEFITS TO GOVERNMENT DEPARTMENTS

4.1 There will be little benefits to Government departments. (DEFRA, the Scottish Government, and Welsh Assembly Government are making similar changes).

5. COMPETITION

5.1 There will not be any direct or indirect limits to the number or range of businesses in the industry caused by the proposed changes to the Regulations and will not change industry's incentives or abilities to compete with each other.

6. ADMINISTRATIVE BURDENS

6.1 Any impact upon existing administrative burdens is too negligible to quantify.

7. EQUALITY AND GENDER IMPACT

7.1 There will be no equality or gender impact resulting from the proposed changes to the Regulations.

8. IMPACT TEST - STAKEHOLDERS

8.1 Key stakeholders will be consulted during the consultation period to gauge their views on the impact of the proposed changes to the Regulations. The impact is not expected to be significant on any stakeholder/business although there may be adverse comments from the farming industry to the transfer of the TSE sampling costs.

9. IMPACT TESTS NOT ALREADY REFERRED TO

9.1 Legal Aid - No increase anticipated.

9.2 Sustainable Development - The proposed amendments to the Regulations are in accordance with the shared UK principles of sustainable development

9.3 Carbon Impact Assessment - The proposed amendments to the Regulations will have minimal effect on carbon emissions as the nature and scale of production, marketing and disposal is likely to remain similar to the previous Regulations.

9.4 Other Environmental Issues - As the nature and scale of production, marketing and disposal is likely to remain similar, the proposed amendments to the Regulations will have minimal implications in relation to climate change, waste management, landscapes, water and floods, habitat and wildlife or noise pollution.

9.5 Health Impact Assessment - The proposed amendments to the Regulations will not directly impact on health or well-being and will not result in health inequalities.

9.6 Human Rights - The proposed amendments to the Regulations are consistent with the Human Rights Act 1998.

9.7 Rural Proofing – Although the majority of producers and many of the suppliers are based in rural areas, the proposed amendments to the Regulations will have the same impact across each region or area and will not provide any barriers that may unfairly disadvantage rural dwellers.