



CONSULTATION ON THE IMPLEMENTATION OF THE OFFICIAL CONTROLS REGULATIONS – Summary Report of NI Stakeholders Responses

August 2019

Summary of Responses

The Implementation of the Official Controls

Regulations consultation was issued 29 August 2019 and closed on 11 October 2019.

- 1 The FSA is grateful to those stakeholders who responded and sets out in the table below responses in order of the group responding.
- 2 The key proposals on which the consultation sought views were:
 - The proposed implementation of the Northern Ireland legislation to provide for the execution of powers and enforcement of the OCR in relation to the FSA areas of responsibility for food and feed law and animal health and welfare.
 - To assess the impacts associated with the implementation of the legislation in England, Wales and Northern Ireland in relation to FSA areas of responsibility only.
- 3 The Food Standards Agency considered responses to stakeholder comments are given in the last column of the table. A summary of changes to the original proposal(s) resulting from stakeholder comments is set out in the final table.
- 4 A list of stakeholders who responded can be found at the end of the document

Summary Table by Groups Responding

Respondent	Comment	FSA Response
Moy Park	<p>Verification of FBO compliance with campylobacter process hygiene criterion</p> <p>We understand that the new legislation will require competent authorities to verify food business operator compliance with campylobacter process hygiene criterion under Regulation (EC) No 2073/2005. Our preferred option would be option 2 (i.e. collect information on the total number of samples and the number with more than 1,000 cfu/g taken by FBOs as per Article 5, Regulation (EC) No 2073/2005, and take samples only where it is considered necessary), as we don't anticipate any additional costs to Moy Park through this option. We note from the consultation that proposals will be discussed with industry before any final decision is taken. However, please see below some points/questions we would welcome some clarification on:</p> <p>1. When would it be considered necessary for the FSA to take samples? We would welcome clear criteria for triggering additional sampling by the FSA.</p> <p>2. Will the additional FSA sampling be included in calculating the site's 10 week rolling average, or is it stand-alone surveillance?</p> <p>3. How many samples will be taken? Will it be 5 composite samples in one sampling session, or will it be 5 composite samples per week across a 10 week rolling period?</p>	<p>Noted</p> <p>Noted</p> <p>TBC</p> <p>TBC</p>

Respondent	Comment	FSA Response
Moy Park	<p>4. Can you provide clarity on any possible actions and triggers for actions. For example, will a non-conformance notification (NCN) be triggered by a single result that is over 1000 cfu/g, or will it be triggered by the percentage of results that are over 1000 cfu/g after a 10 week sampling period?</p> <p>Ante-mortem Inspection (AMI) at the holding of Provenance According to the new regulations, the Competent Authority (CA) may allow AMI to be carried out at the holding of provenance. We would welcome further clarification as to who can be authorised to carry out such AMI and what will be the timeline prior to slaughter. For instance will the AMI be permitted to be carried out by practitioner vets (either private or company employed)?</p> <p>We would also welcome further clarification on what a representative sample from a flock is (as stated in Article 11 of Commission Implementing Regulation (EU) 2019/627). At present OV's are checking every load of birds coming into the slaughter site could this be reduced and used along with food chain information?</p> <p>On-line checks of poultry We welcome the derogation that allows CA's to introduce less supervision of on-line checks of poultry whenever the criteria/conditions outlined in Article 25 of Commission Delegated Regulation (EU) 2019/627 are met by the FBO. However we would welcome some further clarification on what is meant by "representative sample" within the derogation. As this is not defined within the Regulation it will be imperative that Government provides some guidance/criteria to ensure a consistent approach is taken across the UK.</p>	<p>TBC</p> <p>TBC</p> <p>TBC</p> <p>TBC</p>

Respondent	Comment	FSA Response
Moy Park	<p>The regulation states that certain conditions need to be met in order for the derogation to be applied, further clarification on those conditions will be required.</p> <p>In the event of any pilot studies focussing on reduced supervision of on-line poultry checks, we would like to nominate ourselves to take part. We could also propose the format of additional checks that can be carried out at the holding of provenance that could supplement the food chain information and assist the CA in forming decisions in relation to risk based post mortem inspection of poultry.</p> <p>Domestic enforcement feed regulations We note from Annex C that some consequential amendments are being made to the domestic England enforcement regulations relating to feed. Will similar changes be made with respect to the equivalent Northern Ireland feed regulations?</p> <p>General comment We welcome that the new legislation builds upon and clarifies the existing risk-based approach towards the performance of official controls and we support the additional provisions to fight against fraudulent and deceptive practices.</p>	<p>Noted</p> <p>Noted</p> <p>TBC</p>

Respondent	Comment	FSA Response
<p>Environmental Health Department Mid Ulster Council (MUDC)</p>	<p>Q.III We would welcome supporting evidence on the total throughput levels of low capacity slaughterhouses and Game Handling Establishments, and the distribution of such establishments in relation to the new maximum annual threshold. We would also welcome views on our assumption that the new requirement may result in additional costs on such businesses and the degree to which this change is likely to impact them.</p> <p>MUDC considers this question is outside the scope of Local Authority remit.</p> <p>Q.IV: We would welcome any evidence stakeholders are able to provide in relation to the number of food business operators that currently harvest echinoderms from unclassified areas.</p> <p>MUDC does not have any evidence of FBO's currently harvesting echinoderms from unclassified areas within the MUDC area.</p> <p>Q.V: We would welcome views, and where possible supporting evidence, from business importing one or more of the products subject to the above changes. What impact do you believe the harmonising of controls will have on your business?</p> <p>MUDC considers this question is outside the scope of Local Authority remit.</p> <p>Q.VI: We would welcome evidence from stakeholders, and in particular Port Health Authorities (PHAs), on the number of controls on reptile meat and insects currently performed.</p> <p>MUDC considers this question is outside the scope of Local Authority remit as this is a DAERA function.</p>	

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<p>Environmental Health Department Mid Ulster Council (MUDC)</p>	<p>We welcome enforcement authority views on our stated assumptions for training requirements to support delivery of the changes introduced by the OCR. Please provide details of any specific training needs you think will be necessary.</p> <p>MUDC considers that the allocated time for officer familiarisation with the new requirements is significantly under estimated. MUDC would welcome the development of a bespoke training package for Local Authorities outlining the key changes and implications.</p> <p>In terms of Port Health Authorities (PHA), MUDC would request clarification that the current Fish Inspector qualification will meet the needs of the additional training requirements outlined in the consultation.</p>	<p>Initial Assumption We assumed that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff.</p> <p>Updated Assumption We assume that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff and that all other staff members would have to spend 30mins to receive relevant information from managers.^[1]</p> <p>[1] It should be noted that the familiarisation costs assessed in this IA only take into account the time it takes LAs, OCLs and FSA staff to familiarise themselves with the general provisions laid out in the OCR and the Statutory Instruments. The time required to understand the practicalities of implementing the changes will be assessed in the next FLCoP and MANCP updates and via other appropriate communication channels once the details of the changes have been bottomed outFish inspectors qualifications</p> <p>We have assumed that all OFIs will fully meet the requirements without any further training needs.</p>

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<p>Environmental Health Department Mid Ulster Council (MUDC)</p>	<p>We would welcome information from existing specialised border facilities (DPE/Is and BIPs) on what necessary changes and/or upgrades are required in order to obtain certification as a Border Control Post.</p> <p>There are no specialised border facilities (DPE/Is and BIPs) designated within MUDC.</p> <p>Q.IX: We would welcome views from Official Control Labs representatives, or LAs that currently send/receive sub- contracts samples to/from other non- designated laboratories in other Member States. Specifically, we invite evidence on the impact(s) that may arise from this change.</p> <p>MUDC considers that this question is for Official Control Labs as all official control samples from MUDC are sent to an appropriately accredited laboratory.</p> <p>Benefits:</p> <p>Q.X: Do you agree that a harmonised and coherent regulatory approach to official controls will deliver any benefits and/or cost savings to industry? We would welcome evidence on what benefits (if any) you expect to be delivered.</p> <p>MUDC agrees that the harmonisation of these Regulations will simplify the legislative framework under which importers and stakeholders operate. We anticipate that this will reduce the administrative burden on industry and result in associated savings.</p>	<p>Whilst we understand that many OFIs will meet the new requirements, it is currently unclear exactly how many will require additional training. So for the purpose of this impact assessment, we assume that around half of all OFIs might need to be upskilled to perform controls on fishery products.</p> <p>We have also taken in to account the additional costs for the FSA to produce and deliver this training</p>

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<p>Environmental Health Department Mid Ulster Council (MUDC)I</p>	<p>Q.XI: We would welcome stakeholders' views on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence. N/A</p> <p>Q.XII: We would welcome views from PHAs and LAs on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence</p> <p>MUDC does not anticipate any significant benefits for District Councils other than the simplification and consolidation of the existing framework. We do, however, note that the consultation refers to increased scope of goods that will be subject to certain forms of harmonised import conditions for the first time. These changes will include (e.g.) composite products, raw materials from the production of gelatine and collagen, sprouts for human consumption and fats and greaves. Mid Ulster District Council would welcome the impact of these proposed changes to be explained and do acknowledge the later date of April 2021. There are a number of unpublished documents identified in the consultation (e.g.) transshipment of goods entering the EU. Mid Ulster District Council cannot provide comment at this time and would like further opportunity to comment when it becomes available.</p>	

Respondent	Comment	FSA Response
<p>Port Health Unit - City and Neighbourhood Services Department. Belfast City Council</p>	<p>Q.1: Have we appropriately identified the key aspects of the OCR application that apply from 14 December 2019. I agree that based on the information available in the consultation the key aspects have been identified.</p> <p>Q.2: Have we appropriately identified the impacts of the changes that apply from 14 December 2019 in our Impact Assessment? I agree that based on the information available the key impacts have been identified.</p> <p>Q.3: Do you agree with the assumptions made in our Impact Assessment? I agree with the assumptions the FSA have made in the Impact Assessment.</p> <p>Q.4: Are you aware of any other significant impacts of the changes that apply from 14 December 2019? I are not aware of any additional significant impacts of the changes that will apply from the 14December 2019.</p> <p>Questions asked in the Impact Assessment (Annex B)</p> <p>Q.I: Is the total list of identified affected sectors / groups representative? If you partly agree or do not agree please identify other sectors / affected groups that should also be considered and provide reasons for your suggestion.</p> <p>I agree with the sectors of industry that have been identified within the documentation. However, I would like clarification on whether relevant industry bodies have also been consulted, as this was not readily identifiable within the consultation documentation.</p>	

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<p>Port Health Unit - City and Neighbourhood Services Department. Belfast City Council</p>	<p>Costs:</p> <p>Q.II: We would welcome evidence from affected businesses on the expected costs on their establishment if the FSA were to verify compliance by either a) collecting industry data or b) by sampling.</p> <p>I consider this question is outside the scope of Local Authority remit.</p> <p>Q.III We would welcome supporting evidence on the total throughput levels of low capacity slaughterhouses and Game Handling Establishments, and the distribution of such establishments in relation to the new maximum annual threshold. We would also welcome views on our assumption that the new requirement may result in additional costs on such businesses and the degree to which this change is likely to impact them.</p> <p>I consider this question is outside the scope of Local Authority remit.</p> <p>Q.IV: We would welcome any evidence stakeholders are able to provide in relation to the number of food business operators that currently harvest echinoderms from unclassified areas. N/A</p> <p>Q.V: We would welcome views, and where possible supporting evidence, from business importing one or more of the products subject to the above changes. What impact do you believe the harmonising of controls will have on your business?</p> <p>I consider this question is outside the scope of Local Authority remit.</p>	

Respondent	Comment	FSA Response
<p>Port Health Unit - City and Neighbourhood Services Department. Belfast City Council</p>	<p>Q.VI: We would welcome evidence from stakeholders, and in particular Port Health Authorities (PHAs), on the number of controls on reptile meat and insects currently performed. I consider this question is outside the scope of Local Authority remit as this is a DAERA function.</p> <p>Q.VII We welcome enforcement authority views on our stated assumptions for training requirements to support delivery of the changes introduced by the OCR. Please provide details of any specific training needs you think will be necessary.</p> <p>I consider that the allocated time for officer familiarisation with the new requirements is significantly under estimated. I would welcome the development of a bespoke training package for Local Authorities outlining the key changes and implications. In terms of Port Health Authorities (PHA), I would request clarification that the current Fish Inspector qualification will meet the needs of the additional training requirements outlined in the consultation.</p>	<p>Initial Assumption We assumed that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff.</p>

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<p>Port Health Unit - City and Neighbourhood Services Department. Belfast City Council</p>	<p>Q.VIII We would welcome information from existing specialised border facilities (DPE/Is and BIPs) on what necessary changes and/or upgrades are required in order to obtain certification as a Border Control Post.</p> <p>Belfast City Council PHA has raised, with FSA (NI), the current arrangements that they have in place as a designated BIP and DPE and await an assessment audit. It is anticipated that there will be no significant change or upgrade from initial discussions with FSA (NI).</p> <p>Q.IX: We would welcome views from Official Control Labs representatives, or LAs that currently send/receive sub-contracts samples to/from other non- designated laboratories in other Member States. Specifically, we invite evidence on the impact(s) that may arise from this change.</p> <p>I consider that this question is for Official Control Labs as all NI and PHA official control samples are sent to an appropriately accredited laboratory.</p>	<p>Updated Assumption</p> <p>We assume that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff and that all other staff members would have to spend 30mins to receive relevant information from managers.[1]</p> <p>[1] It should be noted that the familiarisation costs assessed in this IA only take into account the time it takes LAs, OCLs and FSA staff to familiarise themselves with the general provisions laid out in the OCR and the Statutory Instruments. The time required to understand the practicalities of implementing the changes will be assessed in the next FLCoP and MANCP updates and via other appropriate communication channels once the details of the changes have been bottomed out</p>

Respondent	Comment	FSA Response
<p>Port Health Unit - City and Neighbourhood Services Department. Belfast City Council</p>	<p>Benefits:</p> <p>Q.X: Do you agree that a harmonised and coherent regulatory approach to official controls will deliver any benefits and/or cost savings to industry? We would welcome evidence on what benefits (if any) you expect to be delivered.</p> <p>I agree that the harmonisation of these Regulations will simplify the legislative framework under which importers and stakeholders operate. I anticipate that this will reduce the administrative burden on industry and result in associated savings.</p> <p>Q.XI: We would welcome stakeholders' views on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence. N/A</p>	

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<p>Port Health Unit - City and Neighbourhood Services Department. Belfast City Council</p>	<p>Q.XII: We would welcome views from PHAs and LAs on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence.</p> <p>I do not anticipate any significant benefits for District Councils other than the simplification and consolidation of the existing framework.</p> <p>I do, however, note that the consultation refers to increased scope of goods that will be subject to certain forms of harmonised import conditions for the first time. These changes will include (e.g.) composite products, raw materials from the production of gelatine and collagen, sprouts for human consumption and fats and greaves. I would welcome the impact of these proposed changes to be explained and do acknowledge the later date of April 2021.</p> <p>There are a number of unpublished documents identified in the consultation (e.g.) transshipment of goods entering the EU. I cannot provide comment at this time and would like further opportunity to comment when it becomes available.</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	FSA Response
<p>Port Health Unit - City and Neighbourhood Services Department. Belfast City Council</p>	<p>Additional Comments</p> <p>I think it would be beneficial that there is better integration with DAERA, DEFRA and FSA on the BCP requirements so they do not contradict other, especially if the spirit of the legislation is harmonisation. Perhaps there is value in a BCP manual or something similar to the BIP manual would be beneficial.</p> <p>Further consultation with ports is welcomed to discuss the unpublished information especially in relation to composites and transhipments.</p> <p>It is my understanding that Grandfather Rights will transfer with existing BIP to BCP's so it should be the case of business as usual. However, I would like to be consulted on any work around - Art 64(3b) 'Premises appropriate to the nature and volume of the categories of animals and goods handled' that may restrict the activities and throughput of a BCP. I am aware that BIPs are approved by category- ambient, chilled, frozen, pre-packed, non- pre-packed, Human Consumption, Non-Human consumption. Is it foreseen that these BIP classifications will apply to the DPE categories for approval? If these categories transfer will BCP's be expected to provide appropriate separate storage facilities or is shared storage acceptable with cross-contamination controls be adequate?</p>	<p>Noted</p>

Respondent	Comment	FSA Response
CIEH NI	<p>In producing this submission, the CIEH has drawn on comments provided by its members. The CIEH is extremely grateful for their assistance.</p> <p>General comments</p> <p>The CIEH has members working across Northern Ireland (NI) and the rest of the UK to ensure food is safe and what it says it is.</p> <p>They work in the public, private and third sectors, making a real difference, training food handlers, working for food businesses advising them of their legal obligations and, on the front line, delivering official controls. They all work with a common aim – keeping consumers safe.</p> <p>Environmental Health Practitioners in local authorities in NI are committed to ensuring consumers have the necessary information to make informed choices about where they eat and purchase food through their participation in the mandatory Food Hygiene Rating Scheme. We are encouraged that the new Regulation (EU) 2017/625 (OCR) at Article 11 <i>Transparency of Official Controls</i> states that: “Competent authorities may publish, or make otherwise available to the public, information about the rating of individual operators based on the outcome of one or more official controls, provided that the following conditions are met:</p>	

Respondent	Comment	FSA Response
CIEH NI	<p>(a) the rating criteria are objective, transparent and publicly available; and</p> <p>(b) appropriate arrangements are in place to ensure the fairness, consistency and transparency of the rating process”</p> <p>Although the CIEH was not listed in the consultation document as an ‘interested party’ we are interested and would be grateful to be listed in future FSA NI consultations as an interested party.</p> <p>Despite this, we welcome the opportunity to comment on FSA proposals for the implementation of The Official Controls Regulation (EU) 2017/625 (OCR) which will apply from 14 December 2019 if:</p> <ul style="list-style-type: none"> • the UK remains in the EU or agrees an implementation/transitional period with the EU. As a general comment, providing meaningful feedback on this consultation has proven challenging not least because of the volume of information provided (95 pages), the layout of the document, the limited time to consider the proposals in consultation with our members. <p>Further, it is noted that the proposal is for the FSA to introduce three statutory instruments (SIs) to ‘provide the execution of powers and enforcement to the OCR and tertiary legislation in Northern Ireland’ but they are not available at the current time. Further information would have been welcomed on how the three SIs will be structured and their scope. If the opportunity arises, we would welcome the opportunity to comment on the draft SIs when they become available.</p> <p>We have restricted the CIEH response to our five main areas of interest. Others will be better placed to address the specific questions in the consultation.</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	FSA Response
CIEH NI	<p>Enforcement Sanctions The CIEH supports work planned by the FSA to consider whether greater use could be made of non-criminal sanctions for food offences that have limited public health impacts. Criminal sanctions can be disproportionate and place unnecessary burdens on professional officers.</p> <p>However, we are of the firm view that along with new non-criminal sanctions, criminal sanctions should be maintained as a fall- back position to deal with persistent offenders or where it may be more profitable for offenders to pay repeated fines than comply with legal requirements.</p> <p>Financing Official Controls We note that (EU) 2017/625 (OCR) expands upon the EUs existing legal basis for the financing of official controls and we welcome this as an opportunity to build a sustainable, adequately funded regulatory system in the UK. Cuts to public services, particularly in England, have seen a reduction in resources available at a local level to deliver official controls. The FSAs LAEMS data provides robust evidence of this. We question why the FSA does not anticipate introducing any changes now or immediately after 14 December 2019 to explore new systems for financing official controls. This may be a missed opportunity and is not consistent with one of the FSAs Regulating Our Future (ROF) principles</p>	Noted

Respondent	Comment	FSA Response
CIEH NI	<p>Principle 5 states that “Businesses should meet the costs of regulation, which should be no more than they need to be”. As a starting point the CIEH would like to see the FSA explore the introduction of fees to cover the costs associated with following up non-compliance.</p> <p>Import Controls on Food Not of Animal Origin (FNAO) and Products of Animal Origin (POAO) for Human Consumption</p> <p>In relation to Border Inspection Posts (BIPS) or Designated Points of Entry (DPE’s) in NI, we understand that Belfast City Council Port Health Authority are currently in discussions with FSA concerning the details of this. We further understand that no major changes from current arrangements are anticipated. Whether or not there will in the future be further BIPs or DPEs in NI remains to be seen. If for example there is a necessity for identity and physical checks on imported foods to be carried out at inland control points, this would impact on the work of Environmental Health Practitioners.</p> <p>Moving forward, it will be necessary to have a sustainable pool of qualified and experienced EHPs to cover Imported Food Controls at a potentially sensitive time for food imports. This is in order to both facilitate trade and provide appropriate risk- based interventions to protect public health.</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	FSA Response
CIEH NI	<p>CIEH considers that the wording of (EU) 2017/625 (OCR) provides for a more overarching interpretation of the definition of “Official Veterinarian”, allowing for both Official Veterinary Surgeons (OVS) and EHPs to carry out checks at ports providing flexibility and continuity at a time of great change and potential challenges.</p> <p>In the current legislation that enacts the related European legislation concerning veterinary checks into UK law – the Trade in Animal Products Regulations 2011 (TARP Regs), a specific derogation exists, and EHPs are referred to as Official Fish Inspectors:</p> <p>“Appointment of official veterinary surgeons and official fish inspectors</p> <p>12.—(1) The Secretary of State must appoint suitably trained veterinary surgeons to be official veterinary surgeons for any border inspection post authorised to import animals.</p> <p>(2) The district council for an area with a border inspection post authorised to import products must appoint suitably trained veterinary surgeons to be official veterinary surgeons for that post.</p> <p>(3) The appointment under paragraph (2) may be made by the Secretary of State rather than the district council if the approval for the border inspection post only permits the importation of animal by-products.</p>	

Respondent	Comment	FSA Response
CIEH NI	<p>(4) The appointment under paragraph (2) may be made by the Secretary of State rather than the district council if the approval for the border inspection post only permits the importation of animal by-products.</p> <p>(5) If the approval for the border inspection post permits the importation of any product (other than snails) for human consumption listed in Chapter 3 of Annex I to Commission Decision 2007/275/EC the district council may appoint suitably trained environmental health officers to be official fish inspectors for that post in relation to fish and fishery products, and that inspector has all the powers of an official veterinary surgeon in relation to these products”</p> <p>Article 49 of (EU) 2017/625 (OCR) does not provide a designation for Authorised Officers or Official Fish Inspectors. Interestingly however, it does make the following distinctions: “animals, except aquatic animals, or meat and edible meat offal, by an official veterinarian, who may be assisted by staff trained in accordance with the requirements established under paragraph 5 in veterinary matters and designated by the competent authorities for that purpose;” “aquatic animals, products of animal origin other than the ones referred to in point (a) of this paragraph, germinal products or animal by-products, by an official veterinarian or by staff trained in accordance with the requirements established under paragraph 5 and designated by the competent authorities for that purpose”.</p>	

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CIEH NI	<p>The critical distinction here is the use of the phrases “may be assisted by staff trained” (for meat and edible meat offal) and “or by staff trained”. This second phrase allows for the continuing use of EHPs in checks for fish and non-animal origin foodstuffs. The CIEH calls upon the FSA to state explicitly in the new Official Controls Regulations that EHPs can be the authorised officers to carry out this work for the avoidance of doubt and continuity of the service.</p> <p>Training</p> <p>The changes to delivery identified in the consultation document suggest that non-Official Veterinarian staff will be required to undergo additional training to carry out official controls. We are not aware of any evidence that supports the need for additional training of EHPs/ Official Fish Inspectors who currently carry out official controls on these products. Such training would be an unnecessary burden to the taxpayer and importers who will have to foot the bill. Further, it could lead to unnecessary delays at a time when keeping trade flowing smoothly will be a Government priority.</p> <p>We believe the (EU) 2017/625 (OCR) presents a significant opportunity to build future sustainability for Imported Food Controls with a fit for purpose service. Currently, the TARP regulations give a designation of “Official Veterinary Surgeon”. This is similar, but not a direct transfer of the EU requirement for “Official Veterinarian”. The definition of Official Veterinarian in Article 3 of 2017/625/EC means a veterinarian appointed by a competent authority, either as staff or otherwise, and appropriately qualified to perform official controls and other official activities in accordance with this Regulation and the relevant rules referred to in Article 1(2);”.</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	FSA Response
CIEH NI	<p>It is specific to the tasks being carried out at the Border Control Point but does not state the professional qualifications required (leaving this free to Member States to decide). Whilst in the past UK legislation has deemed that Official Veterinarians need to be Official Veterinary Surgeons, this may be an over-interpretation of EC law. Our members advise us that most ports currently employ OVS who are EU nationals. They are not UK qualified Veterinary Surgeons. This situation may not be sustainable. It would therefore be hugely beneficial to define EHPs practising in these fields to be deemed to be Official Veterinarians to build operational flexibility into future imported food controls.</p> <p>Qualifications and experience of EHPs Qualified Environmental Health Practitioners (EHPS) are appropriately trained and have the necessary level of technical competence and expertise to implement the new OCRs and enforce the legislation. Food enforcement in the UK is primarily the responsibility of EHPs who are trained in food safety and standards. Their Environmental Health degree qualification is recognised in the Food Law Code of Practice.</p> <p>EHPs working at ports have also completed practical and theoretical training and examinations to meet the requirements set out by the CIEH to inspect, detain and seize meat, as well as products of non-animal origin at a port of entry or the point of sale.</p>	

Respondent	Comment	FSA Response
CIEH NI	<p>In addition to their qualifications, EHPs working at ports receive regular training covering all aspects of imported food controls to ensure their skills and knowledge are kept up to date. This training is provided in-house, as well as by the EU, FSA, DEFRA and CIEH Port Health Panel. Many EHPs working at ports will have also completed 50 or 200 hours of meat inspection, which in addition to allowing them to inspect meat independently also confers the status of a 'veterinary auxiliary'.</p> <p>In the UK, EHPs working at ports enforce import controls on fishery products, high risk non-animal origin foods, other non-animal origin foods, organic imports and fishery products. We are not aware of any serious deficiencies identified by third party audits, which would necessitate or justify changing who carries out official controls in the future.</p> <p>EHPs have experience in risk rating, targeting for the most relevant contaminants and taking the most appropriate course of action in line with legal parameters when non-compliance is found. Port Health Officers (PHOs) are fully conversant in import controls and certification schemes and, most importantly, note the Public Health aspects and risks of the role. In the event of a No Deal Exit or the need for additional checks on food products at ports, it is vital that a qualified and highly trained profession is not excluded from carrying out and enforcing these official controls.</p>	

Respondent	Comment	FSA Response
CIEH NI	<p>The CIEH calls on the FSA to ensure that EHPs will be able to continue to carry out Official Border Controls when the new Regulation is adopted. In addition, the CIEH calls upon the FSA to replace the phrase Official Veterinary Surgeon with Official Veterinarian and apply the definition for Official Veterinarian as set out in Article 3 of 2017/625 allowing for the use of EHPs as Official Veterinarians to achieve all the benefits outlined in this response.</p> <p>Familiarisation We believe from discussions with our members that the proposed time periods proposed at page 21 to allow for familiarisation with the new requirements and legislation is significantly underestimated. Furthermore, given the nature of the local authority landscape in NI we would suggest that this may be better approached through a regional familiarisation process, i.e. a series of events or workshops.</p>	<p>Noted</p> <p>Noted. See response to Local Authority similar questions</p>

Respondent	Comment	FSA Response
Northern Ireland Food Managers Group	<p>Environmental Health Northern Ireland (EHNI) Food Managers Sub Group (NIFMG) welcomes the opportunity to comment on the Consultation on the Implementation of The Official Controls Regulations.</p> <p>Questions asked in the consultation: Q.1: Have we appropriately identified the key aspects of the OCR application that apply from 14 December 2019.</p> <p>NIFMG agree that based on the information available in the consultation the key aspects have been identified.</p> <p>Q.2: Have we appropriately identified the impacts of the changes that apply from 14 December 2019 in our Impact Assessment?</p> <p>NIFMG agree that based on the information available the key impacts have been identified.</p> <p>Q.3: Do you agree with the assumptions made in our Impact Assessment?</p> <p>NIFMG agree with the assumptions the FSA have made in the Impact Assessment.</p>	

Respondent	Comment	FSA Response
Northern Ireland Food Managers Group	<p>Q.4: Are you aware of any other significant impacts of the changes that apply from 14 December 2019? NIFMG are not aware of any additional significant impacts of the changes that will apply from the 14th December 2019.</p> <p>Questions asked in the Impact Assessment (Annex B)</p> <p>Q.I: Is the total list of identified affected sectors / groups representative? If you partly agree or do not agree please identify other sectors / affected groups that should also be considered and provide reasons for your suggestion.</p> <p>NIFMG agree with the sectors of industry that have been identified within the documentation. However, we would like clarification on whether relevant industry bodies have also been consulted, as this was not readily identifiable within the consultation documentation.</p> <p>Costs:</p> <p>Q.II: We would welcome evidence from affected businesses on the expected costs on their establishment if the FSA were to verify compliance by either a) collecting industry data or b) by sampling.</p> <p>NIFMG considers this question is outside the scope of Local Authority remit.</p>	Noted

Respondent	Comment	FSA Response
Northern Ireland Food Managers Group	<p>Q.III We would welcome supporting evidence on the total throughput levels of low capacity slaughterhouses and Game Handling Establishments, and the distribution of such establishments in relation to the new maximum annual threshold. We would also welcome views on our assumption that the new requirement may result in additional costs on such businesses and the degree to which this change is likely to impact them.</p> <p>NIFMG considers this question is outside the scope of Local Authority remit.</p> <p>Q.IV: We would welcome any evidence stakeholders are able to provide in relation to the number of food business operators that currently harvest echinoderms from unclassified areas.</p> <p>NIFMG do not have any evidence of FBO's in NI harvesting echinoderms from unclassified areas.</p>	

Respondent	Comment	FSA Response
Northern Ireland Food Managers Group	<p>Q.V: We would welcome views, and where possible supporting evidence, from business importing one or more of the products subject to the above changes. What impact do you believe the harmonising of controls will have on your business?</p> <p>NIFMG considers this question is outside the scope of Local Authority remit.</p> <p>Q.VI: We would welcome evidence from stakeholders, and in particular Port Health Authorities (PHAs), on the number of controls on reptile meat and insects currently performed.</p> <p>NIFMG considers this question is outside the scope of Local Authority remit as this is a DAERA function.</p> <p>We welcome enforcement authority views on our stated assumptions for training requirements to support delivery of the changes introduced by the OCR. Please provide details of any specific training needs you think will be necessary.</p>	

Respondent	Comment	FSA Response
Northern Ireland Food Managers Group	<p>NIFMG considers that the allocated time for officer familiarisation with the new requirements is significantly under estimated. NIFMG would welcome the development of a bespoke training package for Local Authorities outlining the key changes and implications. In terms of Port Health Authorities (PHA), NIFMG would request clarification that the current Fish Inspector qualification will meet the needs of the additional training requirements outlined in the consultation.</p> <p>We would welcome information from existing specialised border facilities (DPE/Is and BIPs) on what necessary changes and/or upgrades are required in order to obtain certification as a Border Control Post.</p> <p>NIFMG considers that the question is relevant to Belfast City Council Port Health. Belfast City Council PHA has raised, with FSA (NI), the current arrangements that they have in place as a designated BIP and DPE and await an assessment audit. It is anticipated that there will be no significant change or upgrade from initial discussions with FSA (NI).</p>	<p>Initial Assumption We assumed that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff.</p> <p>Updated Assumption We assume that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff and that all other staff members would have to spend 30mins to receive relevant information from managers.[1]</p> <p>[1] It should be noted that the familiarisation costs assessed in this IA only take into account the time it takes LAs, OCLs and FSA staff to familiarise themselves with the general provisions laid out in the OCR and the Statutory Instruments. The time required to understand the practicalities of implementing the changes will be assessed in the next FLCoP and MANCP updates and via other appropriate communication channels once the details of the changes have been bottomed out.</p>

Respondent	Comment	FSA Response
Northern Ireland Food Managers Group	<p>Q.IX: We would welcome views from Official Control Labs representatives, or LAs that currently send/receive sub- contracts samples to/from other non- designated laboratories in other Member States. Specifically, we invite evidence on the impact(s) that may arise from this change.</p> <p>NIFMG considers that this question is for Official Control Labs as all NI and PHA official control samples are sent to an appropriately accredited laboratory.</p> <p>Benefits:</p> <p>Q.X: Do you agree that a harmonised and coherent regulatory approach to official controls will deliver any benefits and/or cost savings to industry? We would welcome evidence on what benefits (if any) you expect to be delivered.</p> <p>NIFMG agrees that the harmonisation of these Regulations will simplify the legislative framework under which importers and stakeholders operate. We anticipate that this will reduce the administrative burden on industry and result in associated savings.</p> <p>Q.XI: We would welcome stakeholders' views on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence. N/A</p>	

Respondent	Comment	FSA Response
Northern Ireland Food Managers Group	<p>Q.XII: We would welcome views from PHAs and LAs on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence.</p> <p>NIFMG does not anticipate any significant benefits for District Councils other than the simplification and consolidation of the existing framework.</p> <p>We do, however, note that the consultation refers to increased scope of goods that will be subject to certain forms of harmonised import conditions for the first time. These changes will include (e.g.) composite products, raw materials from the production of gelatine and collagen, sprouts for human consumption and fats and greaves. NIFMG would welcome the impact of these proposed changes to be explained and do acknowledge the later date of April 2021.</p> <p>There are a number of unpublished documents identified in the consultation (e.g.) transshipment of goods entering the EU. NIFMG cannot provide comment at this time and would like further opportunity to comment when it becomes available.</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	FSA Response
Environmental Health Department, Lisburn and Castlereagh City Council	<p>Lisburn & Castlereagh City Council welcomes the opportunity to comment on the Consultation on the Implementation of The Official Controls Regulations.</p> <p>Questions asked in the consultation:</p> <p>Q.1: Have we appropriately identified the key aspects of the OCR application that apply from 14 December 2019.</p> <p>Lisburn & Castlereagh City Council agree that based on the information available in the consultation the key aspects have been identified.</p> <p>Q.2: Have we appropriately identified the impacts of the changes that apply from 14 December 2019 in our Impact Assessment?</p> <p>Lisburn & Castlereagh City Council agree that based on the information available the key impacts have been identified.</p> <p>Q.3: Do you agree with the assumptions made in our Impact Assessment?</p> <p>Lisburn & Castlereagh City Council agree with the assumptions the FSA have made in the Impact Assessment.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health Department, Lisburn and Castlereagh City Council</p>	<p>Q.4: Are you aware of any other significant impacts of the changes that apply from 14 December 2019?</p> <p>Lisburn & Castlereagh City Council is not aware of any additional significant impacts of the changes that will apply from the 14th December 2019.</p> <p>Costs:</p> <p>Q.II: We would welcome evidence from affected businesses on the expected costs on their establishment if the FSA were to verify compliance by either a) collecting industry data or b) by sampling.</p> <p>Lisburn & Castlereagh City Council considers this question is outside the scope of Local Authority remit.</p> <p>Q.III We would welcome supporting evidence on the total throughput levels of low capacity slaughterhouses and Game Handling Establishments, and the distribution of such establishments in relation to the new maximum annual threshold. We would also welcome views on our assumption that the new requirement may result in additional costs on such businesses and the degree to which this change is likely to impact them.</p> <p>Lisburn & Castlereagh City Council considers this question is outside the scope of Local Authority remit.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health Department, Lisburn and Castlereagh City Council</p>	<p>Questions asked in the Impact Assessment (Annex B) Q.I: Is the total list of identified affected sectors / groups representative? If you partly agree or do not agree please identify other sectors / affected groups that should also be considered and provide reasons for your suggestion.</p> <p>Lisburn & Castlereagh City Council agree with the sectors of industry that have been identified within the documentation. However, we would like clarification on whether relevant industry bodies have also been consulted, as this was not readily identifiable within the consultation documentation.</p> <p>Q.IV: We would welcome any evidence stakeholders are able to provide in relation to the number of food business operators that currently harvest echinoderms from unclassified areas.</p> <p>Lisburn & Castlereagh City Council do not have any evidence of FBO's in NI harvesting echinoderms from unclassified areas</p>	

Respondent	Comment	FSA Response
<p>Environmental Health Department, Lisburn and Castlereagh City Council</p>	<p>Q.V: We would welcome views, and where possible supporting evidence, from business importing one or more of the products subject to the above changes. What impact do you believe the harmonising of controls will have on your business?</p> <p>Lisburn & Castlereagh City Council considers this question is outside the scope of Local Authority remit.</p> <p>Q.VI: We would welcome evidence from stakeholders, and in particular Port Health Authorities (PHAs), on the number of controls on reptile meat and insects currently performed.</p> <p>Lisburn & Castlereagh City Council considers this question is outside the scope of Local Authority remit as this is a DAERA function.</p>	<p>Initial Assumption We assumed that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff.</p> <p>Updated Assumption We assume that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff and that all other staff members would have to spend 30mins to receive relevant information from managers.^[1] [1] It should be noted that the familiarisation costs assessed in this IA only take into account the time it takes LAs, OCLs and FSA staff to familiarise themselves with the general provisions laid out in the OCR and the Statutory Instruments. The time required to understand the practicalities of implementing the changes will be assessed in the next FLCoP and MANCP updates and via other appropriate communication channels once the details of the changes have been bottomed out.</p>

Respondent	Comment	FSA Response
<p>Environmental Health Department, Lisburn and Castlereagh City Council</p>	<p>Q.VII We welcome enforcement authority views on our stated assumptions for training requirements to support delivery of the changes introduced by the OCR. Please provide details of any specific training needs you think will be necessary.</p> <p>Lisburn & Castlereagh City Council considers that the allocated time for officer familiarisation with the new requirements is significantly under estimated. Lisburn & Castlereagh City Council would welcome the development of a bespoke training package for Local Authorities outlining the key changes and implications. In terms of Port Health Authorities (PHA), Lisburn & Castlereagh City Council would request clarification that the current Fish Inspector qualification will meet the needs of the additional training requirements outlined in the consultation.</p> <p>Q.VIII We would welcome information from existing specialised border facilities (DPE/Is and BIPs) on what necessary changes and/or upgrades are required in order to obtain certification as a Border Control Post.</p>	

Respondent	Comment	FSA Response
Environmental Health Department, Lisburn and Castlereagh City Council	<p>Lisburn & Castlereagh City Council agrees that the harmonisation of these Regulations will simplify the legislative framework under which importers and stakeholders operate. We anticipate that this will reduce the administrative burden on industry and result in associated savings.</p> <p>Q.XI: We would welcome stakeholders' views on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence.</p> <p>N/A</p> <p>Q.XII: We would welcome views from PHAs and LAs on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence.</p> <p>Lisburn & Castlereagh City Council does not anticipate any significant benefits for District Councils other than the simplification and consolidation of the existing framework.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health Department, Lisburn and Castlereagh City Council</p>	<p>We do, however, note that the consultation refers to increased scope of goods that will be subject to certain forms of harmonised import conditions for the first time. These changes will include (e.g.) composite products, raw materials from the production of gelatine and collagen, sprouts for human consumption and fats and greaves. Lisburn & Castlereagh City Council would welcome the impact of these proposed changes to be explained and do acknowledge the later date of April 2021.</p> <p>There are a number of unpublished documents identified in the consultation (e.g.) transshipment of goods entering the EU. Lisburn & Castlereagh City Council Council cannot provide comment at this time and would like further opportunity to comment when it becomes available</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	FSA Response
<p>Environmental Health – Commercial Newry, Mourne and Down District Council</p>	<p>Newry Mourne and Down District Council (The Council) welcomes the opportunity to comment on the Consultation on the Implementation of The Official Controls Regulations.</p> <p>Questions asked in the consultation:</p> <p>Q.1: Have we appropriately identified the key aspects of the OCR application that apply from 14 December 2019.</p> <p>The Council agree that based on the information available in the consultation the key aspects have been identified.</p> <p>Q.2: Have we appropriately identified the impacts of the changes that apply from 14 December 2019 in our Impact Assessment?</p> <p>The Council agree that based on the information available the key impacts have been identified.</p> <p>Q.3: Do you agree with the assumptions made in our Impact Assessment?</p> <p>The Council agree with the assumptions the FSA have made in the Impact Assessment.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health – Commercial Newry, Mourne and Down District Council</p>	<p>Q.4: Are you aware of any other significant impacts of the changes that apply from 14 December 2019?</p> <p>The Council are not aware of any additional significant impacts of the changes that will apply from the 14th December 2019.</p> <p>Questions asked in the Impact Assessment (Annex B)</p> <p>Q.I: Is the total list of identified affected sectors / groups representative? If you partly agree or do not agree please identify other sectors / affected groups that should also be considered and provide reasons for your suggestion.</p> <p>The Council agree with the sectors of industry that have been identified within the documentation. However, we would like clarification on whether relevant industry bodies have also been consulted, as this was not readily identifiable within the consultation documentation.Costs:</p> <p>Q.II: We would welcome evidence from affected businesses on the expected costs on their establishment if the FSA were to verify compliance by either a) collecting industry data or b) by sampling.</p> <p>The Council considers this question is outside the scope of Local Authority remit.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health – Commercial Newry, Mourne and Down District Council</p>	<p>Q.III We would welcome supporting evidence on the total throughput levels of low capacity slaughterhouses and Game Handling Establishments, and the distribution of such establishments in relation to the new maximum annual threshold. We would also welcome views on our assumption that the new requirement may result in additional costs on such businesses and the degree to which this change is likely to impact them.</p> <p>The Council considers this question is outside the scope of Local Authority remit.</p> <p>Q.IV: We would welcome any evidence stakeholders are able to provide in relation to the number of food business operators that currently harvest echinoderms from unclassified areas.</p> <p>The Council do not have any evidence of FBO's in NI harvesting echinoderms from unclassified areas.</p> <p>Q.V: We would welcome views, and where possible supporting evidence, from business importing one or more of the products subject to the above changes. What impact do you believe the harmonising of controls will have on your business?</p> <p>The Council considers this question is outside the scope of Local Authority remit.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health – Commercial Newry, Mourne and Down District Council</p>	<p>Q.VI: We would welcome evidence from stakeholders, and in particular Port Health Authorities (PHAs), on the number of controls on reptile meat and insects currently performed.</p> <p>The Council considers this question is outside the scope of Local Authority remit as this is a DAERA function.</p> <p>Q.VII We welcome enforcement authority views on our stated assumptions for training requirements to support delivery of the changes introduced by the OCR. Please provide details of any specific training needs you think will be necessary.The Council considers that the allocated time for officer familiarisation with the new requirements is significantly under estimated. The Council would welcome the development of a bespoke training package for Local Authorities outlining the key changes and implications. In terms of Port Health Authorities (PHA), The Council would request clarification that the current Fish Inspector qualification will meet the needs of the additional training requirements outlined in the consultation.</p>	<p>Initial Assumption We assumed that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff.</p> <p>Updated Assumption We assume that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff and that all other staff members would have to spend 30mins to receive relevant information from managers.^[1]</p>

Respondent	Comment	FSA Response
<p>Environmental Health – Commercial Newry, Mourne and Down District Council</p>	<p>Q.VIII We would welcome information from existing specialised border facilities (DPE/Is and BIPs) on what necessary changes and/or upgrades are required in order to obtain certification as a Border Control Post.</p> <p>The Council considers that the question is relevant to Belfast City Council Port Health. Belfast City Council PHA has raised, with FSA (NI), the current arrangements that they have in place as a designated BIP and DPE and await an assessment audit. It is anticipated that there will be no significant change or upgrade from initial discussions with FSA (NI).</p> <p>Q.IX: We would welcome views from Official Control Labs representatives, or LAs that currently send/receive sub- contracts samples to/from other non- designated laboratories in other Member States. Specifically, we invite evidence on the impact(s) that may arise from this change.</p> <p>The Council considers that this question is for Official Control Labs as all NI and PHA official control samples are sent to an appropriately accredited laboratory.</p>	<p>[1] It should be noted that the familiarisation costs assessed in this IA only take into account the time it takes LAs, OCLs and FSA staff to familiarise themselves with the general provisions laid out in the OCR and the Statutory Instruments. The time required to understand the practicalities of implementing the changes will be assessed in the next FLCoP and MANCP updates and via other appropriate communication channels once the details of the changes have been bottomed out.</p>

Respondent	Comment	FSA Response
<p>Environmental Health – Commercial Newry, Mourne and Down District Council</p>	<p>Benefits:</p> <p>Q.X: Do you agree that a harmonised and coherent regulatory approach to official controls will deliver any benefits and/or cost savings to industry? We would welcome evidence on what benefits (if any) you expect to be delivered.</p> <p>The Council agrees that the harmonisation of these Regulations will simplify the legislative framework under which importers and stakeholders operate. We anticipate that this will reduce the administrative burden on industry and result in associated savings.</p> <p>Q.XI: We would welcome stakeholders’ views on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence.</p> <p>N/A</p>	

Respondent	Comment	FSA Response
<p>Environmental Health – Commercial Newry, Mourne and Down District Council</p>	<p>Q.XII: We would welcome views from PHAs and LAs on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence.</p> <p>The Council does not anticipate any significant benefits for District Councils other than the simplification and consolidation of the existing framework.</p> <p>We do, however, note that the consultation refers to increased scope of goods that will be subject to certain forms of harmonised import conditions for the first time. These changes will include (e.g.) composite products, raw materials from the production of gelatine and collagen, sprouts for human consumption and fats and greaves. The Council would welcome the impact of these proposed changes to be explained and do acknowledge the later date of April 2021.</p> <p>There are a number of unpublished documents identified in the consultation (e.g.) transshipment of goods entering the EU. The Council cannot provide comment at this time and would like further opportunity to comment when it becomes available.</p>	<p>Noted</p> <p>Noted</p>

Respondent	Comment	FSA Response
<p>Environmental Health Department, Ards & North Down Borough Council (ANDBC)</p>	<p>Q.1: Have we appropriately identified the key aspects of the OCR application that apply from 14 December 2019. ANDBC agree that based on the information available in the consultation the key aspects have been identified.</p> <p>Q.2: Have we appropriately identified the impacts of the changes that apply from 14 December 2019 in our Impact Assessment? ANDBC agree that based on the information available the key impacts have been identified.</p> <p>Q.3: Do you agree with the assumptions made in our Impact Assessment? ANDBC agree with the assumptions the FSA have made in the Impact Assessment.</p> <p>Q.4: Are you aware of any other significant impacts of the changes that apply from 14 December 2019? ANDBC are not aware of any additional significant impacts of the changes that will apply from the 14th December 2019.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health Department, Ards & North Down Borough Council (ANDBC)</p>	<p>Questions asked in the Impact Assessment (Annex B)</p> <p>Q.I: Is the total list of identified affected sectors / groups representative? If you partly agree or do not agree please identify other sectors / affected groups that should also be considered and provide reasons for your suggestion.</p> <p>ANDBC agree with the sectors of industry that have been identified within the documentation. However, we would like clarification on whether relevant industry bodies have also been consulted, as this was not readily identifiable within the consultation documentation.</p> <p>Costs:</p> <p>Q.II: We would welcome evidence from affected businesses on the expected costs on their establishment if the FSA were to verify compliance by either a) collecting industry data or b) by sampling.</p> <p>ANDBC considers this question is outside the scope of Local Authority remit.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health Department, Ards & North Down Borough Council (ANDBC)</p>	<p>Q.III We would welcome supporting evidence on the total throughput levels of low capacity slaughterhouses and Game Handling Establishments, and the distribution of such establishments in relation to the new maximum annual threshold. We would also welcome views on our assumption that the new requirement may result in additional costs on such businesses and the degree to which this change is likely to impact them.</p> <p>ANDBC considers this question is outside the scope of Local Authority remit.</p> <p>Q.IV: We would welcome any evidence stakeholders are able to provide in relation to the number of food business operators that currently harvest echinoderms from unclassified areas.</p> <p>ANDBC do not have any evidence of FBO's harvesting echinoderms from unclassified areas.</p> <p>Q.V: We would welcome views, and where possible supporting evidence, from business importing one or more of the products subject to the above changes. What impact do you believe the harmonising of controls will have on your business?</p> <p>ANDBC considers this question is outside the scope of Local Authority remit.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health Department, Ards & North Down Borough Council (ANDBC)</p>	<p>Q.VI: We would welcome evidence from stakeholders, and in particular Port Health Authorities (PHAs), on the number of controls on reptile meat and insects currently performed.</p> <p>ANDBC considers this question is outside the scope of Local Authority remit as this is a DAERA function.</p> <p>Q.VII We welcome enforcement authority views on our stated assumptions for training requirements to support delivery of the changes introduced by the OCR. Please provide details of any specific training needs you think will be necessary.</p> <p>ANDBC considers that the allocated time for officer familiarisation with the new requirements is significantly underestimated. ANDBC would welcome the development of a bespoke training package for Local Authorities outlining the key changes and implications. In terms of Port Health Authorities (PHA), ANDBC would request clarification that the current Fish Inspector qualification will meet the needs of the additional training requirements outlined in the consultation.</p>	<p>Initial Assumption We assumed that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff.</p> <p>Updated Assumption We assume that it would take one manager 1 hour to read the new legislation and 2 hours to disseminate to other members of staff and that all other staff members would have to spend 30mins to receive relevant information from managers.[1]</p> <p>[1] It should be noted that the familiarisation costs assessed in this IA only take into account the time it takes LAs, OCLs and FSA staff to familiarise themselves with the general provisions laid out in the OCR and the Statutory Instruments. The time required to understand the practicalities of implementing the changes will be assessed in the next FLCoP and MANCP updates and via other appropriate communication channels once the details of the changes have been bottomed out.</p>

Respondent	Comment	FSA Response
<p>Environmental Health Department, Ards & North Down Borough Council (ANDBC)</p>	<p>Q.VIII We would welcome information from existing specialised border facilities (DPE/Is and BIPs) on what necessary changes and/or upgrades are required in order to obtain certification as a Border Control Post.</p> <p>ANDBC considers that the question is relevant to Belfast City Council Port Health.</p> <p>Q.IX: We would welcome views from Official Control Labs representatives, or LAs that currently send/receive sub-contracts samples to/from other non- designated laboratories in other Member States. Specifically, we invite evidence on the impact(s) that may arise from this change.</p> <p>ANDBC considers that this question is for Official Control Labs as all NI and PHA official control samples are sent to an appropriately accredited laboratory.</p> <p>Q.X: Do you agree that a harmonised and coherent regulatory approach to official controls will deliver any benefits and/or cost savings to industry? We would welcome evidence on what benefits (if any) you expect to be delivered.</p>	

Respondent	Comment	FSA Response
<p>Environmental Health Department, Ards & North Down Borough Council (ANDBC)</p>	<p>ANDBC agrees that the harmonisation of these Regulations will simplify the legislative framework under which importers and stakeholders operate. We anticipate that this will reduce the administrative burden on industry and result in associated savings.</p> <p>Q.XI: We would welcome stakeholders' views on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence.</p> <p>N/A</p> <p>Q.XII: We would welcome views from PHAs and LAs on any benefits you foresee from the implementation of the OCR. Where possible, please explain your views and provide quantifiable evidence.</p> <p>ANDBC does not anticipate any significant benefits for District Councils other than the simplification and consolidation of the existing framework.</p>	<p>Noted</p>

Respondent	Comment	FSA Response
Environmental Health Department, Ards & North Down Borough Council (ANDBC)	<p>We do, however, note that the consultation refers to increased scope of goods that will be subject to certain forms of harmonised import conditions for the first time. These changes will include (e.g.) composite products, raw materials from the production of gelatine and collagen, sprouts for human consumption and fats and greaves. ANDBC would welcome the impact of these proposed changes to be explained and do acknowledge the later date of April 2021.</p> <p>There are a number of unpublished documents identified in the consultation (e.g.) transshipment of goods entering the EU. ANDBC cannot provide comment at this time and would like further opportunity to comment when it becomes available.</p>	Noted

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