

Sent: by email

26 September

Reference: MSF: 334

Dear Stakeholder

Request for comments on the Regulatory Impact Assessment (RIA) for the Agency's guidance on Managing Manures for Food Safety

I am writing on behalf of the Foods Standards Agency (FSA) to seek your views on the Partial Regulatory Impact Assessment (RIA) produced for the Agency's guidance on Managing Manures for Food Safety. The RIA is a tool which enables government to weigh evidence on the positive and negative effects of proposed interventions. The guidance is attached for information at Annex I. We are not seeking comments on the guidance itself as this was subject to a formal consultation in 2002, amended in light of comments received and subsequently agreed with key stakeholders.

Fresh produce can be associated with a wide range of pathogens and there are occasions where fresh produce has been identified as the source of an outbreak of food poisoning. The Food Standards Agency has a programme of work that aims to contribute to the identification, understanding and control of the microbiological hazards and risks associated with fresh produce. This work supports the Agency's strategic aim to reduce the number of cases of food poisoning.



INVESTOR IN PEOPLE

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Large amounts of organic waste, mainly animal manure and sewage sludge, are recycled to land in the UK, offering a route of disposal which utilises its fertiliser value and maintains soil quality and fertility. These wastes can contain pathogenic micro organisms and there are concerns that these pathogens can be transferred from the waste to food crops and subsequently cause food poisoning. Direct deposition from grazing animals to land is also a concern. In 1999 the FSA initiated a programme of research to provide evidence and information to help assess the relative risk to the consumer from this practice. The Agency developed guidance, with a stakeholder steering group, on managing farm manures to reduce the microbiological hazards and risks associated with fresh produce based on the results from this research. The voluntary guidance aims to provide growers with practical guidance on reducing the risks of food borne illness resulting from microbiological contamination of ready to eat crops.

The guidance was agreed some time ago and the Agency would now like to complete the publication process. An RIA must therefore be completed to assess the impact and benefits of the guidance to determine whether publishing the text is the most appropriate option for the Agency. A partial RIA has been produced which considers 2 options:

Option 1: To do nothing. The Agency's guidance will not be published but will be used to provide advice on the food safety aspects of the application manures to agricultural land.

Option 2: To publish the guidance.

The partial RIA indicates the Agency should adopt option 2 and publish the guidance.

I would like to invite you to submit your comments on the partial RIA. Your comments will help the Agency produce a full (final) RIA on the guidance. Views on the

following questions are particularly welcomed (supporting information or data should be included where available):

- Are the conclusions of the partial RIA valid and do you agree that the Agency should publish the guidance?
- The partial RIA does not indicate the guidance is impractical or disproportionate. Is this the case for all producers?
- The four case studies are intended to provide a reality check on the expert judgements used in the cost benefit analysis. Are the associated costs realistic?
- Are there alternative examples of specific production practices where costs associated with implementation would be significantly greater?
- Are the generic assumptions used in the cost benefit calculation accurate, in particular assumptions made about current practices, markets and likely implementation of the guidance?
- Should any additional factors be taken into account, particularly in relation to organic production?

Please can you submit your comments by post or email by **17.00 on Thursday 20 December 2007** to:

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If you would like further information or to discuss the RIA, please contact:

Further information

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Yours sincerely



David Alexander
Microbiology Safety Division

Enc.

1. Regulatory Impact Assessment for the Agency's guidance on Managing Manures for Food Safety
2. Guidance for Managing Manures for Food Safety – final version.