

Regulation Action Plan Commitments Update

FSA BC 25/09/05 - Legislative and Regulatory Strategy Unit

1. Summary

1.1 This paper provides an update on the FSA's progress in delivering our commitments in the Chancellor's Regulation Action Plan.

2. Evidence and Discussion

2.1 In the Regulation Action Plan [published in March 2025](#), we committed that the FSA would:?

- roll out a new approach to food standards inspections across all local authorities in England by spring 2025 and consult on new approaches to food hygiene controls by June 2025. This will make them more risk-based and intelligence-driven, and will reduce the regulatory burden on many compliant businesses;?
- support UK businesses in meeting EU regulatory requirements for food grade recycled plastic, by taking on a new role as the competent authority;?
- prioritise its work on trade to conduct six inward audits in 2025 in order to facilitate trade in food and drink; and?
- establish a regulatory sandbox for cell cultivated products (CCPs). We will publish our first wave of bespoke guidance this year to provide industry with essential clarity on safety and legal requirements to enable these products to be considered for sale.?

2.2 Delivery of all our commitments is on track, with further detail provided in the table below. However, we note that future implementation timelines may be affected by the resource impacts of cross-government work to progress an EU Sanitary and Phytosanitary agreement (SPS).

Commitment 1: roll out a new approach to food standards inspections across all local authorities in England by spring 2025 and consult on new approaches to food hygiene controls by June 2025

2.3 The new Food Standards Delivery Model (FSDM) has been in force since 1 April 2025. It aims to provide a more accurate assessment of risk and compliance within a food business and support a more flexible and intelligence-led approach for local authorities. The FSDM introduces significant changes to the criteria used to assess the risk of food business establishments following an official control, resulting in more frequent checks on non-compliant businesses, whilst reducing the checks on businesses that can demonstrate good levels of sustained compliance.

2.4 Based on LA reporting, the current adoption rate of the new FSDM stands at 97% working to the new model, with 41% having system software fully upgraded to carry out the new model work. FSA continues to work with the main IT providers of the remaining 59% of local authorities, to support these management information system providers in updating their software.

2.5 Our Food Hygiene Delivery Model consultation closed on 19 May. The [summary of consultation responses](#) was published across three nations on 11 August. Stakeholders were broadly supportive of our proposals and we will now move to implement these through the Food Law Code of Practice and Practice Guidance. These changes will allow local authorities to triage businesses at the point of registration and prioritise high risk premises; will recognise new qualifications; and will enable local authorities to use a broader range of official control methods and techniques, including remote official controls in certain circumstances.

2.6 We have a September milestone to provide assurance on implementation, which we are delivering through this report and our FSA Board Paper.

2.7 Our next steps are to proceed through the parliamentary process, with a working deadline of 31 October 2025 to lay the revised Food Law Code of Practice in Parliament. We will conduct wraparound communications with key stakeholders to support this.

2.8 The principal dependencies in this work are FSDM data returns to support FSA reporting on LA activity; clearance of revised FLCOP by ministers across three nations; securing parliamentary time in October; and producing impact assessments and burden analysis; and securing agreement to new burdens being paid.

Commitment 1 milestone plan

Milestones	Status	Due by	RAG
Deliver the new Food Standards Delivery Model	Completed	01 April 25	G
Food Hygiene Delivery Model Consultation	Completed	19 May 25	G
Report to the FSA Board and Business Committee	Completed	September 25	G
Lay the revised Food Law Code of Practice in Parliament	On track	31 October 25	G

Commitment 2: support UK businesses in meeting EU regulatory requirements for food grade recycled plastic, by taking on a new role as the competent authority

2.9 We have established a joint working group of UK Government officials to discuss and develop a roadmap for achieving compliance with EU Commission Regulation 2022/1616 on recycled plastic materials and articles in contact with food (Defra leads with FSA in support).

2.10 FSA auditors have been identified, and we are developing an auditing checklist and specifications. Training for auditors in non-EU authorities will take place in August and October 2025.

2.11 The FSA has been officially designated to undertake audits under official controls of recycled plastic food contact materials in England and Wales by Ministers, in respect of EU Commission Regulation 2022/1616. We continue to engage with policy counterparts in Northern Ireland and Scotland to ensure that there will be a consistent approach to audits across the UK.

2.12 UK-based recyclers have submitted applications to the EU, and we are verifying their technical documentation. At this time, we have requested further information from five recyclers and have received two responses. One recycler has met the requirements and can be scheduled for audit, subject to the timely completion of training and other internal preparations. We

anticipate more recyclers being ready for an audit by September, following the satisfactory conclusion to the individual requests for further information.

2.13 Our target is that the first audits under official controls of UK plastic recycling sites will be begin by 30 November 2025, and we will submit our first set of audit reports to the European Commission by 1 February 2026, thereby meeting our Regulation Action Plan commitment.

2.14 The principal dependencies for delivery of the above are trainer availability and other logistics for delivering the training in October; and plastic recyclers providing appropriate documentation to enable an audit to be scheduled. As shown in 2.12 above, the verification checks are progressing well.

Commitment 2 milestone plan

Milestones	Status	Due by	RAG
Establish joint working group	Completed	30 May 25	G
Develop auditing checklist and specifications	On track	30 November 25	G
Undertake first audits of UK plastic recycling sites	On track	30 November 25	G
Submit first audit reports to European Commission	On track	01 February 26	G

Commitment 3: prioritising our work on trade to conduct six inward audits in 2025 in order to facilitate trade in food and drink

2.15 This commitment relates to the calendar year 2025, and so our reporting here varies from the calendar-year reporting the Business Committee Performance Report.

2.16 We are on track to meet this commitment, having delivered the following audits in 2025:

- In Quarter 4 of 2024/25, we supported an EU audit of GB controls on poultry (Highly Pathogenic Avian Influenza and Salmonella)
- In Quarter 1 of 2025/26, we supported an US audit of UK controls on pork, beef and lamb exports to the USA; and an EU audit of GB controls on live bivalve molluscs.
- In Quarter 2 of 2025/26, we expect to support a South Korean audit of pork and poultry.
- In Quarter 3 of 2025/26, we expect to support an EU audit of GB controls on fish products; and a poultry products audit.

2.17 The principal dependency for this work is Defra (as lead department for trade audits) confirming audit dates for quarter 3. Timings for UK/FSA responses to audit report findings are dependent on receipt of relevant reports. The EU audit work is also linked to EU reset, as audit findings may inform negotiating positions.

Commitment 3 milestone plan

Milestones	Status	Due by	RAG
EU audit of poultry (animal health)	Completed	28 January 25	G

Milestones	Status	Due by	RAG
US audit of pork, beef and lamb	Completed	01 April 25	G
EU audit of live bivalve molluscs	Completed	27 June 25	G
South Korean audit of pork and poultry	On track	17 September 25	G
EU audit of fish products	On track	21 October 25	G
EU audit of poultry products	On track	November 25	G

Commitment 4: establish a regulatory sandbox for cell cultivated products (CCPs)

2.18 The FSA has led four workshops with sandbox participants to identify safety hazards associated with CCP production and how existing food legislation applies to CCPs. These workshops focused on hygiene, production, labelling and toxicological (chemical) hazards

2.19 We have established a cross-government network (CGN) comprising UK government departments and devolved governments to coordinate collective decisions about regulatory issues relation to CCPs. We have had good engagement from other government departments.

2.20 In June we launched our pilot online Business Support Service for individual CCP companies planning to submit a market authorisation application, or who have submitted a market authorisation application and further information is required.

2.21 We have established a network of international regulators, comprising regulators who have already conducting work to assess CCP applications, in order to share learning in a reciprocal manner. The network has met in May, June and August.

2.22 We have instituted a dedicated CCP subgroup of the Advisory Committee on Novel Foods and Processes (ACNFP), to support the FSA in publishing its first wave of bespoke guidance by the end of 2025. This will provide industry with essential clarity on safety and legal requirements to enable these products to be considered for sale. In June, the subgroup met to discuss allergy and nutrition guidance and in August the subgroup met to discuss CCP cell-line and production hazards.

2.23 We are on track to publish guidance by the end of 2025 in line with our delivery plan. The Business Committee paper on the Regulatory Sandbox for Cell-Cultivated Products sets out further details on this. The milestone plan below outlines our expected trajectory, but due to the agile nature of the programme there may be some flex.

Commitment 4 milestone plan

Milestones	Status	Due by	RAG
Lead workshops with industry participants on safety hazards and regulatory policy questions	On track	December 2026	G
Establish a cross-government network to engage with other Government Departments and coordinate collective decisions about regulatory issues	Completed	N/A	G
Establish a Business Support Service for CCP companies planning to submit a market authorisation to the FSA.	Completed	N/A	G

Milestones	Status	Due by	RAG
Establish a network of international regulators to share learning on regulating and assessment of CCP applications	Completed	N/A	G
Create a group of independent scientific experts who will help develop this guidance	Completed	N/A	G
Publication of the first wave of CCP guidance	On track	31 December 2025	G

Innovation Research Programme

2.24 In addition to our Regulation Action Plan commitments, the FSA has received funding from the Department for Science Innovation and Technology (DSIT) which is supporting our new Innovation Research Programme.

2.25 We are due to enter the delivery phase of the programme on 18 August 2025 which will run until the programme's closure on 31 March 2026. The KPIs for this work and progress against them is as follows:

- Validation checks complete on six precision fermentation applications?- At the start of this phase (2) we are on track to commence engagement with the selected applicants. This will be undertaken against a set of criteria as defined during our planning phase and will be monitored through data from the regulated products service.
- Safety assessments complete on four precision fermentation applications?– this is also due to commence during delivery (phase 2) based on data from the regulated products service.
- Draft Terms of Authorisation (ToA) ready for public consultation on two precision fermentation applications?- During phase 2 we will review the terms of authorisation drafted which are ready for public consultation. This will also be monitored through data from the regulated product service.
- Recommendations provided to Ministers for two precision fermentation applications?- Using the new knowledge from Phase 2, we are aiming to deliver these recommendations in March 2026.
- Enhanced engagement with prospective and current precision fermentation applicants and current applicants compared to the existing service ?– Our Business Support Service (BSS) pilot is on track to provide advice and recommendations to registered businesses from 25 September 2025, as well as signposting using the Guidance Hub. We will review the number of consultations which have against the baseline of pre-BSS/Hub consultations to monitor progress.
- Review existing scientific guidance and tailor for precision fermentation applicants?- Supplementary guidance explaining how to use the novel food guidance for precision fermentation products will be produced and published towards the end of the programme and will be based on new knowledge obtained over the course of the programme. The

usefulness of this guidance will be measured qualitatively through industry feedback.?

- Published positions on key policy questions posed by precision fermentation products, to be considered and agreed on a four-nation basis?- As new knowledge emerges (we anticipate from October 2025), legal experts across the four nations will be activated, a lessons learned report will be produced and agreed policy positions will be published to the Guidance Hub on FSA/FSS website iteratively, as they become available.
- Industry understands and can use the guidance to inform their decisions about what data to include in safety dossiers, as well as inform their regulatory strategy?- once the BSS and Guidance Hub are launched on 25 September a qualitative feedback survey will be conducted every three months and analysed in comparison the baseline survey carried out in June 2025.
- Innovation guidance hub makes it easier for producers of all innovative products (not just precision fermentation) to understand regulatory requirements that apply to their products - Upon launching the new Guidance Hub on 25 September, we will measure website traffic and analytics. Feedback on ease of use of the hub will also be included within the three-monthly survey.
- FSA and FSS identify additional opportunities to support innovation in food - at the end of the programme (March 2026), the opportunities identified throughout the course of the programme will be measured using the Theory of Change as a model.

3. Conclusions

3.1 We will continue to report our progress against our Regulation Action Plan commitments to the FSA Business Committee, as well as DHSC, DBT and HMT.

3.2 We remain committed to supporting the government's work to improve regulation and welcome the specific funding we have received for flagship programmes such as the CCP sandbox and the Innovation Research Programme. However, the broader FSA's capacity to prioritise actions to support growth is limited given the current work to support SPS agreement negotiations and the likely substantial programme of work needed for implementation. Therefore, we are unlikely to have capacity to deliver further work in the regulatory action plan space, unless corporate and strategic priorities change.

3.3 We ask the Committee to comment on progress to date and the high-level delivery plan going forward.