Regulatory Sandbox for Cell-Cultivated Products (CCPs)

FSA BC 26/03/08 - Report by: Tom Vincent

1 Summary

1.1 This paper outlines the progress of the Cell-Cultivated Products Sandbox during its second six-month sprint (September 2025 – February 2026) and sets out the high-level delivery plan for the next sprint (March 2026 – August 2026).

1.2 We invite the Committee to comment on progress to date and the forward delivery plan.

2 Overview

2.1 The Sandbox is a two-year programme sponsored by the Department of Science Innovation and Technology (DSIT) run by the Food Standards Agency (FSA) and Food Standards Scotland (FSS). It started in March 2025 and will finish in February 2027. Its purpose is to facilitate extensive dialogue with industry to gather learning about cell-cultivated products (CCPs) that the FSA and FSS can use to inform regulatory actions that are proportionate to the risks of these products, without lowering standards.

2.2 The learning generated will enable the FSA and FSS to:

- Identify the hazards present in CCP production and how their risks can be appropriately mitigated;
- Agree how CCPs fit within the existing novel food regulatory framework; and,
- Have greater engagement with industry so they can better understand the regulatory requirements and how to comply with them.

Ultimately, this will help increase companies' confidence in the UK as a place to do business, supporting economic growth in this sector.

2.3 The FSA and FSS are working with a selected group of participants from business, academia and industry associations to deliver the following outcomes by February 2027:

2.3.1 Regulatory approvals: the FSA/FSS has a greater understanding about CCP hazards and production processes, leading to swifter, better-informed risk assessments and recommendations to ministers than are currently possible, reaching a typical timeframe for a routine, non-complex

application of approximately 2.5 years.

2.3.2 Industry confidence: the CCP industry has a much clearer understanding of what information they need to provide in their applications and how long this will take, reducing delays and improving investor confidence in the ability of CCP applicants to meet required regulatory standards. Consequently, companies have more confidence in choosing the UK as the place to grow their business and submit CCP applications.

2.4 The following progress has been made to date:

2.5 Regulatory approvals

Risk assessment of CCP applications

2.5.1 We are on track to meet our aim to complete risk assessments for two CCP applications by the end of the programme in February 2027. Two applications have passed the validation stage, confirming that each application contains all the necessary information and meets the required standards to proceed to formal risk assessment, where scientific experts will evaluate the safety of the products based on the submitted data.

2.5.2 The validated applications have now progressed into the risk assessment stage. They were reviewed by our advisory committee, the Advisory Committee of Novel Foods and Processes (ACNFP), in February 2026. During this meeting, Committee members assessed the Committee Advice Document and undertook a formal hazard identification of each application. This process highlighted any critical data gaps and is supporting the development of targeted information requests that will be issued to applicants. These requests will provide the evidence required to progress the robust assessment of the safety of the novel food under the proposed uses.

2.5.3 The allocation of dedicated resources to the CCP Sandbox and the increased knowledge the programme has generated has significantly enhanced our ability to assess applications. The learning taken from the work of the Sandbox is contributing to us issuing Requests for Further Information (RFI) to applicants more efficiently and is significantly increasing the pace and efficiency of assessments. For example, before the programme started in March 25, the average time taken to issue the first RFIs on CCP applications was 195 days (data average from four applications), this has reduced to 90 days (data average from three applications).

Production of industry guidance

2.5.4 We have published guidance that will assist in the regulatory authorisation process. Further detail is provided in Annex A.

2.6 Industry confidence

Investor and CCP company surveys

2.6.1 To measure whether business and industry confidence has improved because of the work of the Sandbox, we are issuing regular surveys to (a)?CCP companies and (b) investors in CCP companies. Both surveys were initially issued in April 2025 to obtain a baseline understanding at the start of the programme. We have now issued them a second time. The data from both survey rounds shows a positive perception of the Sandbox programme from businesses and investors.

- Companies: Before the programme, **7** CCP companies said that they were confident and wished to submit an application to our system when they were ready to do so. In the survey taken in October, that number had risen to **13** companies. The responses indicate that business

confidence and understanding in CCP regulation is improving, supported by public updates on the FSA/FSS websites and better understanding of regulatory requirements. Equally, the number of companies that said they were confident that they knew what type of data they should include in their applications rose from **6** to **11** between the two surveys.

- **Investors**: Investor confidence in CCP businesses seeking to get their product authorised in the UK is increasing. One investor explicitly stated that: "*…we are in the process to invest in one company who has submitted an application. Participation in the Sandbox is an important driver for our investment decision.*"

2.6.2 These findings indicate that the programme's objectives (i.e. to publish guidance on the technical data requirements for applicants, and to provide clarity on how regulations apply to these products) are aligned to industry requirements and that the work of the Sandbox has positively impacted investor confidence.

2.6.3 Key areas for improvement identified by businesses include clearer guidance on application structures, as well as more transparent timelines for approvals. The Sandbox is using industry feedback obtained through Sandbox workshops, the business support service and events/webinar feedback to inform clear guidance to support a more consistent and quicker regulatory pathway through the risk analysis process.

Feedback from Business Support Service users

2.6.4 The scientific team from the Sandbox provides tailored, early?stage pre- and post-submission engagement with companies developing CCPs, helping them understand regulatory expectations, identify potential hazards, and generate the right data for their application. By engaging with businesses early on their regulatory journey, the service enables higher-quality dossiers and supports a more efficient application process, while also enabling the Sandbox to gather valuable scientific and technical insights from prospective and current applicants. This two ?way learning strengthens the evidence base, informs the production of technical guidance, and ultimately helps create a more predictable, transparent pathway for bringing innovative products to market.

2.6.5 Users of the Business Support Service continue to provide consistently positive feedback regarding the quality, responsiveness, and clarity of the support offered. Positive comments have been received from companies both involved and not involved directly as a Sandbox participant, demonstrating the broader impact and credibility of the service beyond the immediate programme participants. Feedback received includes:

- a non-Sandbox participant service user who did not wish to be named stated they felt the Business Support Service "*helped us understand the proper regulatory scope*" and indicated it has supported them in "*how to proceed with authorising our product for the GB market*";

- Blue Nalu (a Sandbox participant company): "*The Business Support Service was a simple way to engage directly with regulatory experts and clarify expectations. Enabling our business to directly discuss areas of interest with the FSA CCP team helps to resolve issues earlier and guide us to generate a submittal with more informed content*";

- Roslin Technologies (a Sandbox participant company): "*The FSA's ability to engage with novel food applicants prior to submission is a major benefit for both the applicant and FSA to create a mutual understanding and enable an efficient progress. In that respect, the UK distinguishes itself favourably from other jurisdictions*";

- Hoxton Farms (a Sandbox participant company): "*This one-to-one advice service has been one of the most valuable elements of the CCP Sandbox, and we see clear value for the UK in maintaining it beyond the duration of the programme" calling the service "critical in helping Hoxton*

Farms prepare our UK submission, with the team providing clear, actionable feedback that enabled us to align our regulatory package with their expectations."

Feedback provided via in-person events

2.6.6 In January 2026 we hosted an industry engagement event jointly with the Alternative Protein Association, to showcase the progress of both the Sandbox and Innovation Research Programme, share details of recently published guidance, and receive industry feedback. The event was well received, with further positive feedback from industry for our willingness to share details of our work and our transparency.

2.6.7 We have continued to share the learning of the programme to non-Sandbox participants through conversations with companies at conferences and engagement events. As part of these, there has been general support for the positive approach of FSA/FSS in working to develop a regulatory framework that supports these innovative products whilst also maintaining existing high safety standards for consumers. Anecdotal evidence suggests that this has encouraged companies to view the UK as a viable market earlier in their development plans than might previously have been considered, prompting them to invest time and resources into preparing regulatory applications at earlier stages.

3 Summary of key successes in Sprint 2

3.1 Annex A outlines in detail the successes the programme has made in achieving the agreed deliverables for the second sprint between September 2025 and February 2026. A summary of these successes is described below.

3.1.1 Guidance Publication: The Sandbox has published the three pieces of guidance as planned for 2025:

- Novel food taste trials guidance (October 2025)

- Classification guidance (December 2025)

- Allergens and nutrition guidance (December 2025)

3.1.2 ACNFP-CCP subgroup: To date, four meetings of this subgroup have been held. The work of this group supported the development of the first piece of tailored CCP supplemental technical guidance on allergenicity and nutrition published December 2025. Progress has also been made towards subsequent pieces of guidance on (a) CCP identity & production process and (b) toxicology and growth media composition, both to be published in 2026.

3.1.3 Participant workshops: During this sprint, we conducted three thematic workshops on: regulatory authorisation; microbiology; and imports/exports. This learning will inform the formulation of our regulatory policy positions and guidance throughout, as well as the development of technical guidance the remainder of the Sandbox.

3.1.4 Running and utilisation of the CCP Cross-Government Network (GGN) and the Advisory Network of International Regulators (ANIR): We carried out all our planned CGN and ANIR meetings during this sprint. We covered topics such as the regulation of imports and exports of CCPs, the approach to regulatory authorisation as novel foods, and our approach to the application of hygiene requirements to CCPs, the identity of the final CCP products and the regulation of microbiological and toxicological hazards. We are using the networks to co-develop policy positions in areas that cut across departmental remits and further develop our regulatory guidance.

3.1.5 Business Support Service: Seven companies have used this service to engage FSA early in their regulatory journeys to support them in developing high quality applications for regulatory approval that meet the high standards required for effective risk assessment; both from within the Sandbox participants and the wider industry. Relative to the size of the CCP sector, the number of Business Support Service applications received indicates a strong demand for regulatory guidance. One of these companies have since gone on to submit their application after taking on board this feedback. We have received applications for support from organisations who are both part of the Sandbox, as well as wider industry. There has been overwhelmingly positive feedback from participants who have benefitted from this service (see section ?2.6.4 above).

3.1.6 Dedicated webpages for CCPs: we have kept our dedicated CCP consumer and business webpages updated with all the latest achievements of the programme, including summaries of our workshops on the consumer facing pages. This work ensures that all CCP businesses, not only those taking part directly as a Sandbox participant, are kept updated and can share in the benefits of the programme.

4 Risk assessment of CCP applications during Sprint 2

4.1 One of the Key Performance Indicators (KPIs) for the programme is the completion of at least two CCP risk assessments within the Sandbox period. Sandbox activities such as continuous knowledge transfer between industry and the risk assessors, and resourcing of subject matter experts within the newly established CCP ACNFP subgroup, has given further confidence in our ability to meet this objective.

4.2 The programme tracks progress being made on individual CCP applications, to ensure we meet our KPI of completing two risk assessments by February 2027 (outlined below). The table below updates on progress against the FSA's wider deliverables for CCP risk assessments during Sprint 2, enabled by the activities of the Sandbox:

Risk assessment deliverables (September 2025 - February 2026)

- January 2026: Draft Committee Advice Documents for applications that have been validated. DELIVERED
- February 2026: ACNFP initial consideration of validated applications. DELIVERED
- Applications considered by ACNFP remain on track for completing formal risk assessment by February 2027. The completion is, however, also dependent on the ability of applicants to provide meaningful, timely responses to the further information requests highlighted by ACNFP

4.3 Application status update. We are currently on track to meet our KPI of completing two risk assessments by February 2027. Other CCP applications are progressing through the system. We will be able to provide a detailed outline to the Committee of the timeline of the assessment of the applications upon request.

4.4 We are satisfied with the pace of delivery during the second sprint of activity. Sandbox participants have openly shared insights and views with us, which has put us in a good position for being able to continue generating regulatory policy and hazard management guidance positions. We have met our programme targets for publication of guidance and remain on track for completing the risk assessment of two applications by February 2027.
However, maintaining this pace of work for the remainder of the Programme is critically dependent on information continuing to be shared from participants and delivery partners outside of the FSA.

5 Forward look for Sprint 3

5.1 We will continue to manage the work as an agile programme, composed of a series of six-month sprints. The plan for what we intend to deliver in the next six months (March – August 2026) is set out in **Annex B**, and the key highlights of the third sprint of the programme will include:

5.1.1 Participant workshops: We will hold further industry workshops throughout 2026. During the 2025 workshops, we managed to acquire high-quality information through the workshop sessions with industry and academic Sandbox participants covering all aspects of regulation that affect CCP production. As such, we been able to adjust our workshop timeline to bring some topics forward.

5.1.2 Bespoke technical guidance: In July 2026, we aim to publish supplemental technical guidance on CCP identity, production process and microbiology. This will be the second of three pieces of technical guidance to support applicants in producing higher quality regulatory applications.

5.1.3 The third piece of technical guidance will be published in Sprint 4, addressing how to assess the hazards associated with toxicology and growth media composition. All technical guidance will be drafted using the learnings gathered through the CCP Sandbox including participant workshops and CCP ACNFP Subgroup, and review by the ACNFP Committee.

5.1.4 Bespoke regulatory guidance: Following the publication of guidance on the classification of CCPs as POAO in December 2025, we are exploring how the rest of the POAO legal requirements apply to CCPs. We are aiming to publish guidance on the application of hygiene requirements in July 2026, to provide necessary information on how the current legislative and regulatory framework on POAO applies to CCPs.

6 Assurance & Key Performance Indicators (KPIs)

6.1 A number of KPIs were agreed with DSIT at the outset of the programme. We have put in place bespoke assurance tools that are used to track performance against each of the KPIs. Details of the KPIs and assurance tools were provided in the March 2025 Business Committee paper.

6.2 The assurance tools are reviewed on a six-weekly basis by the Sandbox Programme Board (which includes senior DSIT representation), and any necessary remedial action taken. The Programme Board are currently content that the work is on track. A copy of the assurance tools can be provided to Business Committee if useful.

7 Risks

7.1 Completion of risk assessments. There is a risk that CCP businesses are not able to produce the required quality data to address the gaps identified during risk assessment support risk assessment conclusions in a timely manner, leading to the FSA not being able to complete two risk assessments by the end of the programme. The launch of the Business Support Service is helping to minimise this risk, as it provides an additional mechanism for Sandbox risk assessors to directly communicate with current or prospective CCP applicants and give clarity to businesses to enhance their knowledge of the regulatory process and receive further clarity in respect to any technical questions. As with other novel foods, we are actively tracking all CCP applications in the system to identify and tackle potential blockers early, to reduce the risk of not delivering these risk assessments within the agreed timeframe, whilst ensuring the risk assessment remains robust and assures food safety and protects consumer interests.

7.2 UKG SPS agreement. In May 2025, HMG and the EU agreed to work towards a Common Sanitary and Phytosanitary (SPS) agreement, with the view toward reducing barriers to the movement of agri-food products between the UK and the EU. Exactly what will fall under this agreement is subject to negotiations between HMG and the EU later this year, but the GB market authorisation service and how far it will align with the EU's market authorisation service will be included in the discussions.

7.3 The team is conscious of ongoing SPS negotiations and is preparing for different outcomes. The team is confident that regardless of the outcome to the SPS agreement, the Sandbox will still be useful in gathering knowledge that will be used to inform UK positions on regulatory and scientific questions. In developing regulatory positions relating to the FSA and FSS's role as a competent authority, the programme is answering questions that the FSA and FSS would need to decide regardless of the negotiation outcomes. We will continue to deliver the Sandbox programme as planned, and if it becomes clear that that negotiations will affect the programme, then we will agree with DSIT how to alter the programme's outcomes and update Sandbox participants.

8 Next steps

8.1 We will continue to provide updates on progress and any issues arising to the FSA Chair and Deputy Chair via three-monthly check point meetings. We will provide a further update to the Business Committee in six months' time.

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

Annex A - Review of sprint 2

The agreed deliverables for the first sprint between September 2025 and February 2026 for each of the key workstreams are set out below. **All areas were delivered.**

Workstream and Deliverables	Update
Running the ACNFP subgroup **September 2025**: Main ACNFP review of **nutrition and allergenicity** guidance in preparation for publication **October 2025**: ACNFP subgroup undertakes first review of guidance for the management of **toxicological hazards and growth media composition** **January 2026**: ACNFP subgroup undertakes second round of input, and subsequent review of draft guidance positions regarding the management of **cell line identity, production processes and microbiological hazards** **DELIVERED**	The subgroup is made up from a core of three members from the Advisory Committee on Novel Foods (ACNFP) and also engages additional external expertise to advise on set topics. The subgroup provides expert advice to the FSA, informing the development of guidance of how to mitigate hazards associated with CCPs. In September 2025, the main ACNFP review was conducted on the draft Allergenicity and Nutrition guidance. ACNFP expert members discussed the guidance considerations and came to agreements on how the guidance should be presented. There were some comments within the allergenicity section that required additional input prior to receiving approval from the committee. The finalised Allergenicity and Nutrition guidance was published by FSA/FSS on 4th December 2025, meeting the target to publish the first wave of guidance by the end of 2025. In October 2025, the subgroup met to discuss toxicology and hazards associated with the growth media components used during CCP production. The discussion focused on key questions and the initial positions of FSA/FSS to support the development of hazard guidance on these topics for CCP applicants. In January 2026, the subgroup met to discuss for the second time the topics of Identity, Production and Microbiology, to discuss in-depth topics that had previously been identified as areas requiring further exploration. The draft guidance was also reviewed by members for comment. These conversations have informed what is to be included in the guidance and how this should be presented, supporting the development of robust and clear hazard safety guidance for industry.

Workstream and Deliverables	Update
Participant Workshops **October 2025: regulatory authorisation** of CCPs as novel foods, including the conditions of authorisation, how scale-up might affect the initial authorisation and what the requirements are when other regulated products are used in CCP production **November 2025**: microbiological hazards, plus **hygiene and production** (e.g. the selection of cell-lines, use of different growth medias, and allergenicity). **December 2025**: Workshop to begin to explore industry experiences in relation to **import and export** of CCPs **January 2026**: No workshops during this month. (progress review and planning period) **February 2026**: Follow-up workshop on **toxicological hazards and growth media composition** will include further discussions on the potential hazards associated with the components within the growth media required to produce CCPs and agreeing a framework for meaningful, proportionate toxicological risk assessment **DELIVERED**	Themed workshops were run with the Sandbox participants to explore regulatory policy issues across several topics. The insights gained will continue to be used to develop the FSA's policy approach to CCP regulation and to develop corresponding guidance. **October: regulatory approvals workshop.** This session focused on the authorisation process of CCPs as novel foods. We discussed the Terms of Authorisation in novel foods and some of the common types of authorisation conditions, seeking from participants to understand how these might work in practice in the sector. We also discussed what changes businesses expect when they scale-up and the implications for authorisation. We also explored with participants what other types of regulated products (such as food additives) might be used by industry in CCP production and how that might affect the authorisation process. Finally, we explored further the identity of CCPs based on their composition and production, especially the inclusion of ingredients of plant or animal origin in CCP production. **November: microbiological hazards, production and hygiene workshop.** This session explored microbiological considerations for CCPs and revisited the topics of production and hygiene. The participants explained the key microbiological considerations for CCPs including cell isolation and?ensuring?traceability and health status of the source animal. The group addressed?further topics including?HACCP? principles,?genetic?stability?and?consumption?intake assessments. Finally, the workshop participants re-visited?topics?relating to?hygiene?including hygiene protocols?and facility registration.?? **December: Import and Export Workshop.** This session focused on the import and export of cell-cultivated products and the type of regulatory guidance that would be useful to industry on this topic. Key challenges including knowing what?the different import and export requirements for CCPs are across international?jurisdictions. We discussed key issues the industry is facing such as applicability of existing official controls documentation, pathways for importing products for research and development and how industry can support itself. **February: toxicology and growth media workshop.** The session revisited key toxicological considerations for CCPs, building on insights gathered during the first workshop, and focused on areas where additional clarity is needed to support future guidance development. Participants discussed the importance of full disclosure of all components and processing steps involved in CCP production, including the challenges for transparency around proprietary media formulations. Current analytical techniques and challenges around the validation of new methodologies was also highlighted during the session. The workshop also examined the distinction between processing aids and food additives, highlighting how this classification influences regulatory expectations and the type of data applicants must provide. Additionally, we covered practical considerations such as the quality of water used during various stages of the CCP production, including its implications for safety assessments and process controls. Participants also shared information on emerging development areas within the sector, which is useful for development of a future focussed guidance and novel food strategy.

Workstream and Deliverables	Update
Bespoke Guidance **October 2025**: Publication of guidance on conducting **taste trials** for novel foods, including CCPs **December 2025**: Publication of guidance on **classification of CCPs** as POAO. **December 2025**: Publication of guidance on **allergenicity and nutrition hazards** **December 2025**: Production of draft guidance on **cell line identity, production processes and microbiological hazards** ahead of publication in Sprint 3 **DELIVERED**	The programme is producing a suite of technical guidance documents outlining the potential hazards associated with CCPs and the types of information applicants need to provide for a robust safety assessment. The technical guidance will also be used by risk assessors and the independent Scientific Advisory Committee to ensure assessments are consistent, transparent, and grounded in the latest scientific understanding. Additionally, as the programme aims to reduce the length of the authorisation process as a whole and not only the risk assessment stage, we are working pre-emptively to answer key policy questions ahead of applications reaching the risk management stage. We have and will publish these positions in the form of guidance documents to provide clarity for the CCP industry. The learnings from the participant workshop sessions play a pivotal role in shaping both our technical and policy guidance. Guidance will continue be published in waves during the programme. In Sprint 2, we delivered our commitment to publish: 1. Updated novel food taste trials guidance. This provides a clear steer not only to CCP companies, but to the entire novel food sector, of the guidelines to follow should they wish to carry out taste trials of unauthorised novel foods in GB. 2. The classification of CCPs as POAO, which establishes how these products fit within the current regulatory framework. 3. The allergenicity and nutrition hazards guidance, setting out the information businesses are required to provide in their novel food application in relation to their products' nutritional profile and allergen assessment. Publication was delivered alongside associated comms plans, which were positively received by industry. This is also reflected in the results of the second run of the business survey. 4. A draft version of the Identity, Production and Microbiological guidance was prepared in December 2025 and formed part of the papers provided to the January 2026 CCP ACNFP subgroup for comment and discussion within the session.
Cross-Government Network October 2025: meeting revisiting **hygiene, microbiological hazards and CCP production** and forward look towards **regulatory approval** and **import/export of CCPs** November 2025: meeting sharing further learning on **regulatory approvals, hygiene, production and microbiological hazards**, and forward look towards **toxicological hazards** of CCPs February 2026: meeting sharing learning on **import/export** and **toxicological hazards** **DELIVERED**	The Cross-Government Network is comprised of key Government organisations and devolved administrations across all 4 UK nations, with an interest in the field of CCPs or holding overlapping policy responsibility. This forum facilitates active four-nation working, aiming to share our learning from workshops on the CCP sector and Novel Foods legislation to facilitate early discussions and coherence in resolving any issues where we are in ongoing discussions on impacts and resolution. The learnings feed directly into our work developing our policy positions, including where such positions cross the remit of other government departments. Similarly, they will be used by other departments to shape their own positions and guidance. **October 2025**: We presented a forward look at October's 2025 workshop on regulatory approvals. We discussed the authorisation of CCPs as novel food, scale-up and how that affects the products authorisation, as well as the use of other regulated products in CCP production. **November 2025**: We shared findings from October's workshop session on the conditions of authorisation, how modifications to existing CCP authorisation will work, the use of other regulated products for CCP production. We also discussed the findings around microbiological hazards and how they are mitigated, included ensuring the health status of source animals and traceability, sterilisation of the cell line and cell line integrity. We gave a forward look at our work on CCP imports and exports, specifically the key challenges around: different legislations, different trade requirements and lack of global harmonisation. We also discussed the current status on policy positions concerning hygiene legislation in context of CCPs. **February 2026**: We discussed our findings from the December 2025 session on Imports and Exports, including how POAO classification impacts international trade, challenges meeting requirements for export and veterinary health certificates and uncertainty around import routes for CCPs used in taste trials or for further processing rather than sale. We also presented a forward look on the upcoming session on toxicological hazards and growth media composition including details on the use of all growth media components, as well as the requirements of the toxicological assessment of a CCP's novel food application. Finally, we informed the group of the next steps of our workstream regarding the labelling requirements and the relevant guidance to be published.

Workstream and Deliverables	Update
Advisory Network of International Regulators November 2025: meeting sharing learning about **regulatory approvals, hygiene, production and microbiological hazards**, and forward look towards **import/export** January 2026: meeting sharing learning about **import/export** and forward look towards further discussions on **toxicological hazards** **DELIVERED**	The network consists of international regulators who have already conducted assessments of CCP applications or who are advanced in their preparations to receive them. The purpose of the meetings is to facilitate active communication and build working relationships with other food safety regulators. Discussions focus on the Sandbox team sharing learning and insights from workshop discussions and exploring how the other regulators have tackled the issues we are identifying as we develop our framework. The learnings feed directly into our work developing our policy positions, as well as our technical and policy guidance. **November 2025**: We covered our findings from the October 2025 workshop on the authorisation of CCPs as novel food, scale-up and how that affects the products authorisation, as well as the use of other regulated products in CCP production. We also discussed the findings from the November 2025 workshop around microbiological hazards and how they are mitigated, included ensuring the health status of source animals and traceability, sterilisation of the cell line and cell line integrity. **January 2026**: We shared our findings from the December 2025 Workshop on the key import and export challenges, such how the POAO classification impacts international trade; documentation and timelines; requirements for export and veterinary health certificates and import routes for CCPs used in taste trials or for further processing rather than sale. Finally, we provided a forward look on the upcoming session on toxicological hazards and growth media composition.
Business Support Service Ongoing delivery of the service, with positive feedback from users and continued allocation of meetings within agreed timelines. **DELIVERED**	This initiative was launched in June 2025. The service is designed to assist businesses preparing to submit applications for cell-cultivated products (CCPs) to the UK market authorisation process. It provides tailored support throughout the lifecycle of an application, offering both pre- and post-submission guidance. Depending on the nature of the applicant's enquiry, we can offer either written advice or a one-to-one meeting. The Business Support Service has received eight applications from six different companies offering both pre submission guidance or post submission support. All service applications have been triaged within the specified timelines. Businesses using the service commonly ask about the types of data required for a safety assessment, appropriate study designs, and how to approach hazard identification for novel production systems. They also frequently seek clarification on allergenicity and nutritional evidence needs, expectations around compositional analysis, toxicological assessment and how to demonstrate process controls or manufacturing consistency. The service receivers have been overwhelmingly positive with their feedback to date with all users stating they were 'very satisfied' with the service, and all users found the service to be 'very helpful' or 'extremely helpful'. All users would recommend the service to others. Users of the service are a mixture of both Sandbox and non-Sandbox participants. All feedback is used to ensure that the highest quality service is provided. Direct quotes can be found in section ?2.6.4 above.

Workstream and Deliverables	Update
Wider Sector Engagement **December 2025**: External communications to accompany publication of guidance **Ongoing**: publication of summaries of each industry workshop to support transparency of our approach **DELIVERED**	Engagement with the wider CCP sector is key to ensure the work of the Sandbox has the furthest possible reach, so that all CCP companies looking to act in the UK market have access to information on how the regulatory framework applies to their product. In addition to delivering our sprint 2 commitments (external communications when publishing guidance and publishing workshop summaries), the Sandbox team have initiated and delivered significant additional wider sector engagement during this sprint. This includes: **Webinars and face to face events to engage directly with industry.** Two industry-facing webinars and a face-to-face engagement event took place during sprint 2. The initial webinar, hosted by the Good Food Institute, took place in October 2025 prior to publication of guidance. This webinar introduced the programme to industry and laid out what they could expect over the coming months. Following publication of guidance, the team delivered a highly successful in-person industry event, hosted by the Alternative Protein Association in January 2026. This event enabled the team to present the recent guidance to industry and seek feedback directly, as well as a dedicated networking opportunity. This event was well received by industry, who welcomed the opportunity to engage directly with the FSA. This was followed with an industry webinar the following week, hosted by GFI, to ensure companies unable to attend the in-person event had access to the same information. Further webinars are planned for Sprints 3 and 4. **Attendance & presentation at key conferences.** Various members of the team were able to showcase the work of the Sandbox at industry facing events, as well as learn from others' presentations and other engagement as part of these events. Learnings from these events will directly inform the development of guidance and stakeholder engagement. Key events include: • Future Food Tech in London (September 25). This included a main stage presentation around regulation of novel food, and hosting a roundtable discussion specifically on the CCP Sandbox • Regulating the Future of Foods conference, Amsterdam (October 25). This forum brought together industry and a range of regulators to discuss challenges in regulation of novel foods. Regulators in attendance included EFSA & the European Commission, Food Standards Australia & New Zealand, and the Food Safety and Standards Authority of India. The Sandbox team showcased developments to date and participated in two panels on challenges with risk assessment and regulatory Sandboxes. The FSA received a significant amount of positive feedback on how the Sandbox was being perceived by industry as a beneficial programme helping to speed up innovation and making the UK a more attractive place to do business. • the 11th International Scientific Conference on Cultivated Meat (ISCCM) at Maastricht, Netherlands. This a major global forum for scientific and regulatory developments in cultivated meat. Through participation in scientific sessions and a panel on cross?sector collaboration, we showcased the UK's regulatory innovation model and shared insights from the Sandbox approach. The conference provided valuable intelligence on emerging science, evolving global regulatory practices, and industry needs, strengthening our understanding of the increasingly complex CCP landscape. **Singapore International Agri-food Week (SIAW) and desk exchange with the Singapore Food Agency:** one member of the team was invited by the Singapore Food Agency (SFA) to represent the FSA at a series of events linked to SIAW, including the Regulators' Forum, Regulatory Roundtable, TFoodS conference, and a dedicated desk exchange with SFA. This provided a significant platform to showcase the CCP Sandbox internationally, strengthen relationships with a key global regulator, and gain first?hand insights into Singapore's approach to innovative food technologies. The engagement enabled the team to share the UK's regulatory innovation model, deepen scientific and regulatory understanding, and gather intelligence that will directly inform ongoing Sandbox work and wider Regulated Products activity within the FSA. **Consumer engagement:** We are continuing to collaborate with CARMA, which is leading a further series of citizen forums. These forums explore regulatory policy options with citizens in relation to CCPs, e.g. on product labelling and regulatory transparency. The insights gathered are adding to the FSA's own consumer research and evidence base, which includes regularly gathering data from the FSA's Consumer Insights Tracker. This workstream ensures that, alongside food safety, our commitment to protecting consumer interests in relation to food remains prioritised throughout the programme. **Other communications:** We also regularly utilise the FSA's Market Authorisation newsletter in order to provide timely updates to subscribed industry participants and public subscribers.

Workstream and Deliverables	Update
Industry Monitoring **October 2025**: repeat survey to understand how the work of the Sandbox is **impacting industry** **October 2025**: repeat survey to understand how the work of the Sandbox is **influencing investor confidence** in the UK CCP market The results from these tracking surveys will be reviewed by the Programme Board **DELIVERED**	The data we will gather through our business and industry surveys allows us to understand how the work of the Sandbox is impacting industry and enable the team to make adjustments to the delivery plan if intelligence deems this necessary. The results from these tracking surveys are reviewed by the Programme Board and will be included in the final CCP Sandbox Review Report upon completion of the programme in 2027. The results from the latest round of surveys were positive from both industry and investors. Industry feedback showed that they find the work of the Sandbox useful as it has improved their confidence and understanding what data to include in applications and how regulations apply to their products. Investor feedback also showed a positive response to the Sandbox, as it increases their confidence towards the UK as a viable market for alternative proteins which encourages them to invest in CCP companies. However, we aim to increase the number of participants for the next round of the investor survey and are actively considering how to change our approach, including timing the next survey round to coincide with a comms moment linked to guidance publication.
Governance **September 2025: Business Committee update** (6 monthly) **November 2025 & February 2026: Portfolio Board update** (quarterly) **November 2025 & February 2026 CEO / Chair checkpoint** (quarterly) **Ongoing Programme Boards** (6 weekly) **DELIVERED**	The Programme Board consisting of FSA, FSS and DSIT senior officials is well established and actively working through delivery issues from the Programme. The Programme Board meets every six weeks to review delivery progress, manage any issues arising, provide steers and relevant decision-making. The Programme also continues to provide quarterly progress updates to EMT in their role as change Portfolio Board, and detailed checkpoint meetings with the Chief Executive Officer, and the Chair and Deputy Chair of the FSA Board are also held quarterly.

Annex B - planned deliverables for Sprint 3 (March 2026 - August 2026)

Workstream	Planned Deliverables
Running the ACNFP Subgroup	**April 2026**: **CCP subgroup** undertakes second (and final) round of input, and subsequent review of draft guidance positions regarding the management of **toxicology and growth media composition of CCPs.** **April 2026**: Identity, production and microbiology guidance to be reviewed at the **Main ACNFP** **June 2026:** Toxicology and growth media composition guidance to be reviewed at the **main ACNFP** **April, June and August 2026**: Validated CCP applications to be reviewed at the **main ACNFP** for market authorisation.
Bespoke Guidance	**July 2026**: Publication of guidance on **cell line identity, production processes and microbiological hazards** **July 2026** Publication of guidance on **Hygiene requirements**
Participant Workshops	From April 2026, workshops will convert to being “catch-all” where multiple topics can be discussed in a single workshop. This will give us an opportunity to revisit topics where we require more information in order to inform upcoming guidance, as well as get feedback on the various pieces of guidance we have already published. Workshops in this sprint are scheduled for April 2026 and June 2026.
Cross-Government Network	In line with the shift to “catch-all” workshops, the planning for the Cross-Government Network will follow a similar pattern. The upcoming sessions will be used flexibly to cover the workshop topics and seek input from other government departments on a range of topics as needed. The agendas will be firmed up closer to the meeting dates and will broadly align with workshop agendas. CGN meetings in this sprint are scheduled for April, May and July 2026.

Workstream	Planned Deliverables
Advisory Network of International Regulators	In line with the shift to “catch-all” workshops, the planning for the Advisory Network of International Regulators will follow a similar pattern. The upcoming sessions will be used flexibly to cover the workshop topics and seek input from other international regulators on a range of topics as needed. The agendas will be firmed up closer to the meeting dates and will broadly align with workshop agendas. ANIR meetings in this sprint are scheduled for March, May and July 2026.
Business Support Service	Ongoing delivery of the service Review of the service
Wider Sector Engagement	External communications to accompany publication of guidance, currently planned for June/July 2026. Ongoing: publication of summaries of each industry workshop to support transparency of our approach June 2026: third industry webinar hosted in cooperation with the GFI. This session will cover any recently published guidance and provide an overview of current and upcoming Sandbox work. Continued contributions to the FSA’s Market Authorisation newsletter
Industry Monitoring	During this sprint, we will repeat both surveys to understand how the work of the Sandbox is **impacting industry** as well as **influencing investor confidence** in the UK CCP market. The timing of these surveys will be determined in Spring 2026, to coincide with the publication of guidance currently planned for June/July 2026. The results from these tracking surveys will be reviewed by the Programme Board.