

Regulation Action Plan Commitments

FSA BC 25/06/05 - Report by Sabrina Jones & David Holmes

1. Summary

1.1 The Chancellor's [Action Plan](#) was published on 17 March. It sets out the government's strategy to ensure that regulators and regulation support economic growth and foster innovation.

1.2 For the FSA, this plan translates into four commitments to be delivered by April 2026 that align with the broader government objectives of streamlining regulations and supporting industry compliance. We will continue to monitor our progress against these commitments and will update the Business Committee as we receive additional information on expectations (including reporting requirements) from central government.

2. Introduction

2.1 The UK government has committed to fostering economic growth and reducing regulatory burdens. The Action Plan includes measures to cut red tape, enhance regulatory efficiency, and ensure that regulations facilitate rather than hinder economic progress. This approach is designed to empower regulators to adopt more flexible and innovative practices, thereby enabling businesses to thrive while maintaining high standards of safety and compliance.

2.2 The FSA has made four specific commitments under the Action Plan:

- Implementing new approaches to food standards inspections
- Supporting businesses in meeting EU regulatory requirements for recycled plastics
- Prioritising trade audits
- Develop and publish industry guidance for CCPs utilising the regulatory sandbox

2.3 This paper provides an update on our progress in delivering each of these commitments and the steps we are taking to ensure delivery by the end of the year.

3. Discussion

3.1 A new approach to food standards inspections across local authorities in England and consultation on new approaches to food hygiene controls

Progress to Date:

3.2 The FSA has already made the necessary changes to the Food Law Code of Practice (FLCoP) to introduce the new Food Standards model, which allows local authorities (LAs) to adopt a more risk-based approach to interventions. It became a statutory requirement for LAs to deliver against that model from 1 April 2025.

- The FSA continues to engage with local authorities and their management information systems (MIS) providers to support them to move to this model. As at the start of May 2025, 20 of 154 LAs have fully transitioned. 73 LAs are working to the new model and are waiting on the required MIS updates to fully complete the process. The remaining 61 LAs are at various stages of transition and we are following up with them to ensure continued progress to complete the rollout. We will now move to performance management against the new model.
- We have initiated a statutory consultation on new approaches to food hygiene controls which will, if adopted, allow LAs more flexibility in how they undertake interventions particularly at low-risk premises, including using remote technologies. The consultation closed on 19 May.

Next Milestones:

- Food Standards-The FSA Board will receive an update on the adoption rate and performance management of the new food standards model by 1 September.
- Food Hygiene-Subject to the outcome of consultation, the necessary changes to the Food Law Code of Practice (FLCoP) for food hygiene by 31 October.

Delivery Risks:

- The new model has now been introduced, but the timing of LAs' transition to it in practice is dependent on MIS providers updating their software systems, which may vary due to specific commercial arrangements.

Actions to mitigate risks:

- Ultimately, LAs are now required to adopt the model and must ensure, through their contractual arrangements with MIS providers, that the necessary changes are made. FSA will continue to work closely with LAs and MIS providers to support this process. The Chief Executive has written to LA Chief Executives to underline the importance of making the transition, and we will continue to monitor the situation closely. An update will be provided to the Board publicly in September.

3.3 Supporting UK businesses in meeting EU regulatory requirements for food grade recycled plastic, by taking on a new role as the UK competent authority (CA)

Progress to Date:

- We have formally notified the European Commission that the FSA will undertake the role of CA for the UK in regard to the regulatory requirements for food grade recycled plastics. A joint working group consisting of UK Government officials has been established to discuss and develop a roadmap for achieving compliance with EU Commission Regulation 2022/1616. The FSA is currently considering a number of delivery model options.

Next Milestones:

- The official designation of the FSA as the competent authority for audits under official control requirements is expected by June 2025.
- The first audits under official controls of UK plastic recycling sites are expected to commence by 30 November 2025.

Delivery Risks:

- Industry may not be prepared for the EU requirements, leading to potential delays.

Actions to mitigate risks:

- The FSA will work with Defra to engage with the industry and ensure clarity on the requirements. The FSA will confirm the auditing specification and approach, either through a tendering process or in-house auditors.

3.4 Prioritising our audits on trade to conduct six inward audits in 2025, in order to facilitate trade in food and drink

Progress to Date:

- Two audits have taken place so far this calendar year:
 - January 2025: EU audit on UK's animal health controls on poultry, including High Path Avian Influenza controls (HPAI) on poultry production.
 - March and early April 2025: United States Department of Agriculture (USDA) audit of UK controls on pork, beef and lamb exports to the USA.

Next Milestones:

- Post-audit activities, including response to and implementation of audit findings for the two audits already completed will be completed by June 2025.
- Pre-audit activities for the outstanding four audits, including completion of Pre-audit Questionnaires and preparation of relevant businesses and Local Authorities for the audits.

The four further audits are scheduled for:

- June 2025: EU audit GB of controls on Live Bivalves and Molluscs (Confirmed).
- September 2025: South Korea Pork and Poultry audit (Confirmed).
- September 2025: EU audit of GB controls on Fish products.(Date TBC)
- November 2025: EU audit of GB controls on Poultry meat.(Date TBC)

Delivery Risks:

- Audit schedule clashes could necessitate simultaneous pre-audit activities and audits. The timeline may be influenced by Defra and importing countries' agreed dates, potentially affecting the FSA's ability to meet targets for the audits awaiting dates.

Actions to mitigate risks:

- The FSA will support visits to businesses involved in production, handling, cold stores, and laboratories during the audits. The FSA will coordinate with Defra, the lead department on trade audits, to ensure timely completion of the audits.

3.5 Develop and publish industry guidance for CCPs utilising the regulatory sandbox

Progress to Date:

3.6 The FSA has created space to explore and address regulatory issues for CCPs, helping to streamline and improve market authorisation for novel food technologies.

- The FSA was awarded £1.6m funding from DSIT to establish a two-year regulatory sandbox to explore the regulation of CCPs in the UK. Participants include eight CCP companies, three academic consortia and two trade bodies.
- We have initiated a series of monthly themed workshops with sandbox participants to explore safety hazards associated with CCP production. A Cross-Government Network (CGN) has been established to coordinate collective decisions about regulatory issues relating to CCPs; and an Advisory Network of International Regulators (ANIR) established for reciprocal sharing of learning about regulation of CCPs. From these collaborative discussions, the programme team will be able to produce CCP-specific guidance and address outstanding regulatory questions.

Next Milestones:

- The first wave of bespoke guidance for the CCP industry will be published by the end of 2025.

- A tailored business support service for innovative food companies will be formally launched in summer 2025 and run throughout the programme. Three CCP companies have already received benefited pre-application support meetings.

Delivery Risks:

- There is a risk that businesses may not share information about their processes due to competition concerns.
- Other government departments may not engage within the programme's timeframe or may not see answering CCP regulatory questions as a priority, affecting our ability to answer outstanding regulatory questions.

Actions to mitigate risks:

- The programme team are looking at creative ways to ensure good engagement and discussion take place during workshops, as well as establishing other mechanisms (such as confidential 1:1s) where sensitive information can be shared with us as the regulator.
- The FSA will work with industry and academia to inform our decisions on regulatory positions that balance innovation and consumer safety.

4. Conclusions

4.1 All four commitments are on track and the delivery risks are being managed. Uncertainty remains around central government reporting requirements although we do not expect this to impact on our ability to deliver.

4.2 We will continue to monitor our progress and adapt as needed to meet the government's expectations and contribute effectively to the growth agenda.

4.3 We are working with the Department for Business and Trade (DBT) to ensure we can meet the 25% reduction in administrative burdens. This involves baselining current regulatory costs and identifying areas for reform. Our role in this programme shows our commitment to streamlining regulatory processes without compromising safety and compliance.

4.4 We intend to deliver progress updates on the FSA Commitments to Growth through the Board Business Committee meetings, the next update will be provided at the September 2025 meeting.