FSA Board Meeting - December 2025: Agenda and Papers

Victoria Hall, Town Hall, Reading, RG1 1QH

The agenda for this meeting includes:

- Evaluation of the Meat Charging Discount Regime: Proposals for Revised Support System
- FSA Position on the Codex Precautionary Allergen Labelling Standard including Allergen Thresholds
- National Food Crime Unit Annual Update
- Annual Communications Update
- Annual Governance Report
- Report from the Chair of the Northern Ireland Food Advisory Committee (NIFAC)

09:00 Chair's Introduction and Chair's Report

Professor Susan Jebb presents the minutes and actions from the previous FSA Board meeting in September 2025 and presents the Chair's report.

FSA 25/12/01- Minutes of 17 September 2025 Board Meeting

FSA 25/12/02 - Actions Arising

09:20 Chief Executive's Report (FSA 25/12/03)

Katie Pettifer presents the Chief Executive's report to the FSA Board.

FSA 25/12/03 - Chief Executive's Report.

09:55 Evaluation of the Meat Charging Discount Regime: Proposals for Revised Support System (FSA 25/12/04)

James Cooper introduces a paper providing an update on progress towards a revised system of support for some abattoirs through our charging model for regulation.

FSA 25/12/04 - Evaluation of the Meat Charging Discount Regime: Proposals for Revised Support System

10:35 Break

10:55 FSA Position on the Codex Precautionary Allergen Labelling Standard including Allergen Thresholds (FSA

25/12/05)

James Cooper introduces a paper setting out the latest on the Codex proposals for a global standard on Precautionary Allergen Labelling (PAL), including the use of thresholds.

FSA 25/12/05 - FSA Position on the Codex Precautionary Allergen Labelling Standard including Allergen Thresholds

11:25 National Food Crime Unit Annual Update (FSA 25/12/06)

Reginald Bevan introduces a paper detailing the activities and achievements of the National Food Crime Unit (NFCU) from the period of November 2024 to November 2025.

FSA 25/12/06- National Food Crime Unit Annual Update

11:45 Annual Communications Update (FSA 25/12/07)

Claire Forbes, Director of Communications, presents a paper providing an update on the work of the FSA's communications team.

FSA 25/12/07 - Annual Communications Update

12:05 Annual Governance Report (FSA 25/12/08)

Timothy Riley introduces the Governance Report for 2025.

FSA 25/12/08 - Annual Governance Report

12:25 Lunch

13:10 Report from the Chair of the Northern Ireland Food Advisory Committee (NIFAC) (FSA 25/12/09)

Anthony Harbinson introduces his report as the Chair of the Northern Ireland Food Advisory Committee (NIFAC) on the activity of the Committee for the period December 2024 to November 2025.

FSA 25/12/09 - Report from the Chair of the Northern Ireland Food Advisory Committee (NIFAC)

13:25 Report of November ARAC meeting (INFO 25/12/01)

INFO 25/12/01 - Report of November ARAC meeting.

13:35 Report from the Chair of the Business Committee (INFO 25/12/02)

INFO 25/12/02 - Report from the Chair of the Business Committee.

13:45 Reports from the Chairs of the Food Advisory Committees (Oral Reports)

13:55 Any Other Business

14:00 Questions

14:10 Close

Questions to the Board

We are keen to ensure, as far as is practical, that questions are addressed in the discussion at the Board meeting. Notwithstanding discussions on the day, all questions will receive a written reply within 20 working days of the meeting.

For questions that do not relate to a paper on the agenda, please email? correspondence@food.gov.uk and we will aim to respond within 20 working days.? Please note these submissions and their replies will not generally be published.

Please note questions are listed below in the order in which they were received.

Question 1

From: Dr Mark J Tallon, Managing Director, Legal Products Group ltd

Where allergens are below the ED01 level as tested for via industry standard ELISA can this support a free from claim such as Free from Soy or other tested allergen?

These 'Free from' claims are in a similar manner based on PAL and threshold testing yet there are no conditions of use as in Regulation 1924/2006 (Annex of nutrition claims). As such must be based on fact.

However, whilst the ED01 level maybe qualified by testing for the presence of an allergen it may exist in the product (below LOD). Such "free from" claims may induce a consumer with an allergen to use the product.

Given the statement at 3.7 in the codex / allergen discussion, there are no reports in the experimental literature of severe reactions from levels below ED08.

As such can business use the ED01 level be used to support a "free from X" allergen claim on a food label?

Answer:

A ‘free from' claim targets the food at consumers who are hypersensitive to the specified allergen. A food contaminated with the specified allergen at a reference dose of ED01 could be expected to trigger allergic reactions in up to 1% of the consumers it is intended for. ED01 is therefore not considered to be sufficiently protective of consumer health and cannot be used to support ‘free from’ claims.

When a company applies a ‘free-from’ claim for a food allergen on a food product, this should act as a guarantee that the food is suitable for all with an allergy or intolerance and that the specified allergen is absent.

The amount of allergen that causes a reaction with objective symptoms is known as an ‘Eliciting Dose’ (ED). ED01 is the dose where 1% of the allergic population are predicted to have a reaction with objective symptoms. An objective allergic reaction covers the whole spectrum from mild to severe.

Question 2

From: Boyd Butler, IFIS Publishing Ltd

Would you consider countering mis- and disinformation about food safety by creating an App which will be freely accessible to provide consumers with accurate information based in science but translated into simple, clear language? This could be done for less than £10,000 and would be a great start to digital communications.

Answer:

We are actively working to ensure that we can identify and counter mis- and disinformation about food safety should it occur. Ensuring that our science is translated into simple, clear language is at the heart of this.

As part of this work, we are exploring how best to use our existing communication channels, including news media, partnerships and social and digital media, to communicate accurate and up-to-date information. We know that traditional news media is the most effective way for us to reach large numbers of people quickly. Digital media, including our social media channels and those of our partners, are also useful tools, particularly for targeting different audience groups. We are not currently considering creating an app to counter mis- and disinformation, but if we did, we would first look to understand what the audience for such an app might be and how effective it would be in comparison with other communication channels.

Question 3

From: Cefyn Jones, Founder: The Hemp Hound Agency

Paper FSA 25-12-08 outlines the Board’s commitments to transparent governance, consistent decision-making, and effective stakeholder engagement.

Paragraph 3.4 highlights that the upcoming GIAA Effectiveness Review will evaluate leadership and culture, risk management, and partnership working.

Annex 2 (ARAC Terms of Reference) and Annex 5 (Standing Orders) emphasise the importance of assurance, risk oversight, declaration of interests, and the integrity of internal processes.

In that context, could the Board clarify how these governance principles operate in practice at the level of individual stakeholder interactions in regulated products processes (including Novel Foods and Article 4 submissions)?

Specifically:

Consistency of Reasonable Adjustments:

Where reasonable adjustments have previously been granted to a stakeholder in an FSA process, is there an expectation within the Board’s governance framework that such adjustments should be applied consistently in subsequent, comparable processes?

Prior Involvement and Interests of Senior Officials:

How does the Board assure itself that senior officials who have previously been involved in related matters appropriately declare that involvement—and any external interests—before assuming oversight or sign-off responsibilities in a new decision affecting the same stakeholder?

Integrity of Email Filtering and FOI-Relevant Correspondence:

Given ARAC's responsibilities for governance, assurance and risk (Annex 2), what oversight is in place to ensure that internal email filters, routing rules or mailbox management systems cannot inadvertently prevent stakeholder engagement or impede correspondence that may have FOI or governance implications?

A general clarification on these points would support stakeholders across the hemp and CBD sector in understanding how the Board monitors and enforces the governance standards set out in FSA 25-12-08.

Answer:

The FSA is committed to a high standard of transparent governance including the management of potential conflicts of interest. This is the case for all areas of the business, including on matters related to stakeholder engagement on regulated products.

The FSA handles any requests for providing reasonable adjustments in line with the requirements of the Equality Act 2010, which places a duty on public bodies to make reasonable adjustments that remove barriers to access and participation for people with disabilities. The FSA takes its obligations under the Act seriously and all cases are carefully considered on their individual merits to ensure its duty to provide reasonable adjustments is met in each instance.

On prior involvement and interests of senior officials, members of advisory committees, FSA board members and senior officials are required to complete an annual declaration of interests to ensure transparency and manage potential conflicts. Members must declare interests that might be relevant to the food industry or the specific matters under discussion. The types of interests include financial interests, non-personal interests, family interests, or any other interests that a member or official believes could be reasonably regarded as influencing their advice, such as membership in advocacy groups or high-level political activity.

The FSA is committed to protecting the security and integrity of its systems and data. This includes using email filtering to stop the very high volume of genuinely malicious emails we receive from reaching internal networks, in line with guidance from the National Cyber Security Centre. These controls are vital for safeguarding sensitive information, but they can occasionally lead to legitimate emails being quarantined if they contain indicators that Microsoft policies flag as malicious. We actively monitor this and take steps to review and release such messages promptly. Given the scale of malicious traffic we handle, it is not always possible to identify every incorrectly blocked message immediately. However, when an email is found to have been wrongly blocked, we work to adjust our configurations to reduce the likelihood of similar issues in the future.

Question 4

From: Cefyn Jones, Founder: The Hemp Hound Agency

Paper FSA 25-12-07 sets out the Agency's communications approach, including its emphasis on mitigating mis- and disinformation (Sections 3.1–3.3), engaging stakeholders to increase advocacy and insight (Section 2.3), and ensuring proportionate messaging to different consumer and business groups.

Given this, could the Board clarify the governance principles underlying how the FSA determines:

Which stakeholder voices are included or excluded

Section 2.3 notes that communications work “convenes stakeholders to increase advocacy, influence and insight”.

What criteria does the Agency apply when deciding which stakeholders, sectors, or subject-matter experts are engaged during communications planning — and how is balance ensured where the subject area includes scientific disagreement or contested policy?

How the FSA distinguishes between misinformation and legitimate criticism

Section 3.3 refers to mitigating mis- and disinformation and collaborating with the Science Council to prepare content for topics “most at risk of being misrepresented.”

What internal checks ensure that legitimate stakeholder concerns, emerging science, or unresolved regulatory questions are not treated as misinformation or risk-tagged without appropriate scientific scrutiny?

How proportionality is applied to niche or emerging sectors

The paper highlights large-scale campaigns (slush drinks, allergens, food hygiene) but does not set out criteria for niche food sectors that experience frequent regulatory ambiguity or media distortion.

What framework ensures that communications about smaller regulated sectors are proportionate, evidence-based, and do not contribute to inadvertent commercial, reputational, or market harm?

How prior communication controversies are internally reviewed

Does the Board receive assurance that past stakeholder-facing communication decisions — especially where public or parliamentary challenge has occurred — are reviewed for lessons learned?

Clarification on these points would help small and emerging sectors understand how FSA communication policy safeguards fairness, accuracy and proportionality across diverse food industries.

Answer:

One of our guiding principles is transparency and this shapes how we communicate across different contexts. As we develop different communications products and campaigns, we engage with a wide range of stakeholders – from those who wish to be informed and/or contribute to the FSA’s work, to those whom we partner with to help us reach particular audiences. Our stakeholders include those representing consumers, businesses, professional associations, and others with an interest in food safety.

We proactively reach out to stakeholders with different interests and perspectives. All our consultations are published on our website, so anyone can participate and respond. No voices are excluded.

Another principle of our work is that we are science and evidence led. This means that all our communications are underpinned by the latest scientific evidence, and we publish our decisions openly. Our science communications are developed in collaboration with, and reviewed by, colleagues from FSA’s Science, Evidence and Research directorate to ensure accuracy. In highly contested areas we will usually also discuss with our Chief Scientific

Advisor. Recently, we have worked with our Chief Scientific Adviser and the FSA Science Council – an independent expert committee – to help us identify and respond to misinformation where it occurs, using science and evidence to correct inaccuracies and to issue accurate information where needed.

Our campaigns are developed in line with Government Communication Service best practice and are based on food safety and hygiene priorities – for example, around the risk of glycerol in slushies to young children – rather than on sector-based criteria. Engagement with stakeholders, including industry or relevant charities, is part of the process of campaign development. Our messaging to consumers is determined by scientific assessment, including our published risk assessments and risk management advice.

The FSA often facilitate 'lessons learned' sessions to help us understand what worked well on different campaigns, and where things could be improved. These sessions are conducted by the executive, with input from relevant directors.

Question 5

From: Peter Hewson, Veterinary Director, AIMS

AIMS notes that the paper on meat charges discounts makes clear that it does not have the support of industry but is disappointed that the reasons for that opposition get no mention. There are two principal reasons. The first is that there is general acceptance that current complex time-based system is not fit for purpose and replacement by a simple headage system, as used by most of Europe, would completely do away with the need for a discount regime. The second is that a judicial review challenging the legality of charging full cost recovery is due to be heard in the High Court on 5th and 6th of May next year, and, if successful, will have a huge impact on the Agency's proposals. Would it not be sensible to put work on the discount on hold until after the judgment is handed down and in the meantime for the FSA to work with industry to address some of the failings of the current charging system?

Answer:

With the current discount scheme in its tenth financial year of operation, we have carried out an evaluation and established on the evidence that there is an urgent need for reform to ensure that the scheme provides best value for taxpayers and delivers the support where it is most needed.

The FSA acknowledges the reasons AIMS has stated for not supporting reform of the discount system, whilst noting that the comments preceding the question do not reflect the range of views we heard from stakeholders and in part refer to reform wider than the proposals outlined in the Board paper.

The Board paper sets out proposals for a revised support system which would represent a shift away from our current policy which is to progress towards full cost recovery. The proposed approach does not preclude future consideration of the wider issues around charging and by separating the issues of support and charging, the mechanism is adaptable to any future changes. The Judicial Review is not directly about our support for industry to meet charges and its outcome cannot be pre-empted.

As such, the FSA intends to proceed in accordance with the decisions and steers the Board provided at its meeting on 10 December, including public consultation on proposals for a revised support system in Spring 2026. Our work to explore efficiencies that could be realised within the current charging regime will continue.

Question 6

From: Louis Franks, Association of Port Health Authorities

Given the NFCU's reliance on intelligence from LAs at the border and inland when investigating and tracking illegal POAO imports, would the FSA consider promoting the use of IDB (the national intelligence database) amongst local food authorities and supporting a pilot to test it in this context? A particularly common example is illegal POAO mixed in with disposable vapes. Another example is the risk of African Swine Fever from the import of pork products from Europe and the lack of checks at the border.

To our knowledge there is no other software which enables the sharing of sanitised intelligence amongst users. All Trading Standards services in the country already make use of it. EH services are often not aware that they can access IDB, incorrectly assuming it's a TS tool. Where it exists in a unitary council, a licence amendment (no fee) is all that's needed to extend the software to EH.

Without such a system, each LA is operating in isolation, 'blind' to what's going on in the neighbouring borough or elsewhere in the country, as details such as vehicle number plates, driver names etc. cannot be shared via email or via Hub, for example.

Answer:

The FSA recognises the value of IDB as a means to share intelligence with and between local authorities and we have access to the system. We actively promote IDB as an available intelligence system for local authorities to use. This includes specifically referencing IDB in the guidance we have issued to local authorities to support implementation of the new food standards delivery model and in eLearning modules on the new food standards delivery model and on the wider issue of using and sharing intelligence. IDB is also referenced as a route for authorities to share intelligence in the National Food Standards Priorities document we issued to local authorities earlier this year. It is also frequently mentioned in the Inland Enforcement of Imported Food Controls Resource Pack.

We are continuing to explore ways, including use of IDB, in which we can further promote sharing of intelligence between local authorities and also how the FSA can best share the intelligence that we have access to in a way that it can be used to support local authorities to target their interventions effectively.

Question 7

From: Sandeep Kapil, AllergyAwareUK

"NICE guidance on the prevention and treatment of vitamin D deficiency explicitly requires that suitable products be made available for people with specific dietary and religious needs, including Halal. This is clearly intended to improve inclusion and adherence. However, there is growing concern that some medicine and food-supplement manufacturers may be commercially exploiting this guidance by making partial or ambiguous Halal or Kosher claims that fall short of full product and process certification.

For example, promotional materials for certain licensed vitamin D medicines currently state that "the capsules contain gelatine, which is certified as Halal and Kosher", despite Halal compliance requiring whole-product and process certification, not merely certification of one excipient. In the food supplement sector, similar Kosher claims are also appearing without transparent verification.

This is not a theoretical risk. A previous UK regulatory case concerning Adcal-D3 (ProStrakan) found that even where one component was Halal-certified, representing the product as suitable for a strict Halal diet without full certification was ruled misleading and in breach of professional

codes

Prostrakan Case

- This demonstrates how easily communities can be misled where religious dietary claims are loosely applied.

Given that:

- Halal and Kosher status are legally protected food authenticity claims,
- Misrepresentation of food status is explicitly recognised as a form of food crime, and
- The public reasonably expects UK regulators to protect them from misleading religious dietary claims,

What role does the FSA see for itself, alongside MHRA and local authorities, in monitoring, regulating and enforcing the accuracy of Halal and Kosher claims across both food supplements and the wider consumer interface of medicines?

And, in light of the increasing food-crime risk around document fraud and misrepresentation, does the FSA intend to issue clearer national guidance to protect consumers and faith communities from partial or misleading dietary certification claims?"

Answer:

The FSA expects food businesses to know their supply chain and manage fraud risks to protect themselves and consumers. Food businesses have a legal responsibility to sell food (which includes food supplements) that is safe and what it says it is. If a business says food is halal, it must genuinely be halal. It is illegal to falsely label food as halal when it isn't and if anyone suspects mislabelling to have occurred they should contact the relevant local authority who are responsibility for enforcement.

When the FSA's National Food Crime Unit (NFCU) receives intelligence about potential wrongdoing, they complete a robust triage process to formulate an appropriate response. The NFCU would consider the scale, complexity, and impact of any reported fraud before determining whether to act ourselves or whether we disseminate the intelligence to partners for action. It is likely that most cases of food being labelled as halal when it is not would routinely be dealt with by the relevant local authority.

Misrepresentation covers a range of dimensions including quality, status, safety, benefit, origin, or freshness. The NFCU's 2024 Food Crime Strategic Assessment found that most reports regarding the misrepresentation of status, concerned suspected mislabelling or the uncertified production of halal meat. However, these were at low reporting levels.

Misrepresentation of premium status, which could include halal and kosher claims, is relevant to several of the NFCU's control strategy priorities. Our Head of NFCU recently met the Senior Halal Sector Manager from the Agriculture and Horticulture Development Board and consequently the NFCU's Prevention and Outreach team are looking to build relationships with Halal and Kosher certification bodies. By doing so, we hope to better understand risks and vulnerabilities in the sector, increase reporting and build resilience to food crime.