1 BACKGROUND AND SUMMARY

1.1 In November, the Board agreed the FSA Strategy for 2015-20. This paper seeks the Board’s agreement to the key principles of the regulatory strategy, which will inform our approach to our regulatory functions and the way that we work with businesses to deliver benefits to consumers.

1.2 In developing the FSA Strategy, stakeholders emphasised the need for a strong regulator, independent of the food industry, to act as a powerful and well informed champion for consumers. Food businesses told us that a strong, independent and respected regulator protects the reputation of UK food for both domestic consumers and the international export market.

1.3 This government has emphasised the role of effective regulation in supporting their key strategic objective of business growth: “Consumer confidence is, of course, key to growth. This will only be helped by a risk-based, intelligent and responsive regulator who can crack down on the industry rogues who produce unsafe food, giving all businesses a bad name, whilst fostering an environment in which the vast majority of decent, hard-working businesses can flourish” (M Fallon – Minister for Business and Enterprise 2013)

1.4 Much is expected to change in the future in terms of the supply of food and the resourcing of functions traditionally carried out by government. Developing an approach that continues to protect consumers, while being flexible to changing circumstances is likely to require significant cultural and organisational change.

1.5 Annex A sets out the proposed framework of principles for our regulatory strategy, on which our future regulatory activities will be based. In light of the discussion and views of the Board, these will be used to develop a work programme, key elements of which will be highlighted in the overall Strategic Plan that the Board will consider later in the year. As this develops, significant pieces of work that are likely to result in major change will be brought to the Board for discussion and agreement.
1.6 The Board is asked to:

- **Agree:** the direction for the future regulatory approach, in particular that we should:
  - Focus on aligning incentives and disincentives so that food businesses are encouraged to do the right thing for consumers.
  - Move progressively towards a truly risk-based regulatory approach, seeking to reduce the requirements of the law in cases where risk is acceptably low, and increase our ability to intervene where we can have the effect of reducing risk to consumers that is unacceptably high.
  - Work with others including local authorities and businesses to develop complementary and alternative delivery approaches, and associated funding models, recognizing that our objective is to ensure that consumers are consistently protected, informed and empowered.
  - Build a regulatory ‘toolbox’ containing a broad range of interventions including the use of reputational recognition and sanctions.
  - Seek to move to a system that requires businesses to demonstrate and provide evidence of compliance with food law, so that the FSA can effectively verify and challenge that evidence as appropriate.
  - Identify where there is more flexibility in how we deliver our regulatory role in food law, and determine how we could apply that to the benefit of consumers.
  - Identify our priorities for regulatory reform, and plan how to take them forward, including exerting greater influence in the EU and international regulatory arenas.

2 **STRATEGIC AIMS**

Effective regulatory interventions are a critical part of “putting consumers first in everything we do”. The FSA’s regulatory approach will underpin the delivery of both “the right to be protected” and “the right to be informed”.

3 **EVIDENCE**

3.1 There is some evidence about what kind of regulatory interventions work effectively, from experience in this country and abroad, from the food and other sectors. As we develop the regulatory tool box, we will take account of this evidence base, as well as placing a high level of emphasis on assessing and evaluating the impacts of our interventions.

4 **IMPACT**

4.1 Aligning incentives for businesses and making greater use of a wider suite of regulatory tools, is intended to result in benefits for consumers and the impact
of interventions will be measured to enable us to judge the effectiveness of changes.

4.2 The regulatory principles outlined in Annex A are likely to result in a different approach to delivery – one where we are more concerned with ensuring that better outcomes for consumers are delivered, and more open-minded about the means by which those outcomes are achieved. We will look at models that could be complementary or alternative to the current model as well as at ways that we can support the effectiveness and sustainability of the current model.

4.3 We will also focus on how regulatory interventions including official controls, are funded, and where the costs should fall. To protect consumers’ interests in terms of affordability, we have a responsibility to ensure that costs of regulation are kept to a minimum.

4.4 Where regulatory costs fall interacts closely with ongoing work in Europe to replace Regulation (EC) 882/2004 on official controls with a new Regulation on official controls and other official activities. This Regulation will contain the future legal basis for charging for official controls, and any changes are unlikely to apply before 2017-18 at the earliest. Progress with these negotiations and subsequent planning for implementation will be strongly informed by our regulatory objectives.

4.5 We will use robust escalation procedures and more dissuasive sanctions in dealing with repeat offenders and recidivist businesses, and where measures taken are not effective in achieving sustained improvement in compliance, escalation should include removal of a business’s approval to operate, where appropriate. We will develop more rigorous methods for assessing “confidence in management” and seek to develop and deploy effective tools to prevent individuals involved in the running and management of poorly performing businesses from perpetuating poor compliance through creating ‘phoenix’ companies.

4.6 Work has already taken place or is underway on a number of areas that relate to the principles and issues identified in this paper.

- Related to the work on renegotiating Regulation (EC) 882/2004, we are starting to consider what funding models might be appropriate for our future regulatory activities.

- We are working collaboratively with the Sentencing Council, which is currently consulting on draft guidelines on food safety and hygiene

---

2 REGULATION (EC) NO 882/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
offences for England and Wales, with a view to developing sanctions that are dissuasive and proportionate.

- The approach to feed controls agreed by the Board in 2013 and implemented last year is an example of enabling businesses to demonstrate compliance with the regulatory framework, enabling us to focus on challenging those who fail to demonstrate compliance and carry out challenge checking on those who do.

4.7 We will also undertake analysis on how current legislation compares with our strategic objectives, so we can determine where we may need to seek change in this country or through Europe to achieve better outcomes for consumers. And it will be fundamental to determine the metrics that we will use to measure our progress. These are examples of pieces of work that will be brought back to the Board (as per para 1.5) when specific proposals have been developed.

4.8 In developing our specific proposals for changes to regulations and our regulatory approach we will engage fully with a range of stakeholders to help us understand the benefits, costs, risks and opportunities and also identify any potential unintended consequences.

5 CONSULTATION

5.1 Engagement on our approach to regulation and to influencing business behaviour has been an integral part of our wider engagement on the FSA’s Strategy to 2020. If the Board agrees the direction of this strategy, we will commence engagement to discuss these principles and their practical applications in more detail with a wide range of stakeholders. Looking further ahead, stakeholders will be consulted on any proposals for specific future changes.

6 LEGAL/RESOURCE/RISK/SUSTAINABILITY IMPLICATIONS

6.1 Whilst the FSA Strategy envisages a regulatory future where we use a much broader range of interventions, we retain our role as Central Competent Authority, with oversight for a large body of legislation, mainly grounded within the EU arena. If our review of the regulatory stock identifies areas where changes are needed this will require legal input to support the Board in decision making and, where appropriate, to support implementation – potentially a lengthy process.

6.2 The FSA Strategy 2015-2020 commits us to consider our regulatory and other initiatives from the point of view of sustainability, as a sustainable food supply for the future is one of the consumer interests in relation to food that we identify as important. Assessing the impacts of specific initiatives as they are developed will therefore include looking at any impacts on sustainability of the food supply.
7 DEVOLUTION IMPLICATIONS

7.1 Colleagues in Wales, Northern Ireland and Scotland have been involved in developing the approach. Wales and Northern Ireland will continue to be engaged in this work, particularly as we develop further engagement with stakeholders and consumers.

7.2 Once Food Standards Scotland (FSS) is established in April, our Chair and the Chair of FSS may find it useful to discuss with a view to identifying shared interests and where the FSA and FSS can work together for the benefit of consumers across the UK.

8 CONSUMER ENGAGEMENT

8.1 As outlined in section 5 above, our approach to regulation has been an integral part of our discussions with consumers in developing the wider Strategy. We are planning to discuss more details with the FSA’s Consumer Advisory Panel in February, and will undertake wider consumer engagement as part of the work outlined at Sections 4 and 5 above.

9 CONCLUSION AND RECOMMENDATIONS

9.1 Annex A outlines a regulatory strategy for the FSA. It is our view that significant change is required from our current regulatory approach to secure the outcomes that our new Strategy identifies as important for consumers, whilst still fulfilling our EU and domestic legal obligations. This approach is likely to require cultural and organisational change, using a broader definition of regulation, applying a wider range of tools and interventions, and developing sustainable delivery and funding models for the future.

9.2 This work is intrinsically linked to the future funding of official controls and other forms of regulation, and needs to inform, and be informed by, ongoing negotiations on the legal basis for charging in EU law, as well as agreeing principles of who should pay the costs of controls.

9.3 The Board is asked to:

- **Agree** direction for the future Regulatory Strategy, in particular that we should:
  
  o Focus on aligning incentives and disincentives so that food businesses are encouraged to do the right thing for consumers – including complying with laws designed to protect their interests.
  
  o Move progressively towards a truly risk-based regulatory approach, seeking to reduce the requirements of the law in cases where risk is acceptably low, and increase our ability to intervene where we can have the effect of reducing risk to consumers that is unacceptably high.
<table>
<thead>
<tr>
<th>Work with others including local authorities and businesses to develop complementary and alternative delivery approaches, and associated funding models, recognizing that our objective is to ensure that consumers are consistently protected, informed and empowered.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Build a regulatory ‘toolbox’ containing a broad range of interventions including the use of reputational recognition and sanctions.</td>
</tr>
<tr>
<td>Seek to move to a system that requires businesses to demonstrate and provide evidence of compliance with food law, so that the FSA can effectively verify and challenge that evidence as appropriate.</td>
</tr>
<tr>
<td>Identify where there is more flexibility in how we deliver our regulatory role in food law, and determining how we could apply that to the benefit of consumers.</td>
</tr>
<tr>
<td>Identify our priorities for regulatory reform, and plan how to take them forward, including exerting greater influence in the EU and international regulatory arenas.</td>
</tr>
</tbody>
</table>
ANNEX A

1 INTRODUCTION

1.1 In 2014 the Board approved the strategy for the FSA for 2015-2020. In developing the strategy they reviewed a large amount of evidence and engaged with consumers, colleagues within the FSA, and a very wide range of stakeholders (academic and scientific, consumer organisations, local authority partners, industry representatives and other government departments and NGOs), to identify the key themes that the FSA would use to inform its planning for the period 2015-2020.

1.2 A number of critical themes emerged that need to inform our approach to regulation, our role as a regulator, and the ways in which we seek to influence business behaviour to benefit consumers.

“The main objective of the Agency in carrying out its functions is to protect public health from risks which may arise in connection with the consumption of food (including risks caused by the way in which it is produced or supplied) and otherwise to protect the interests of consumers in relation to food.”
(From Section 1 Food Standards Act 1999)

1.3 Focusing on this purpose, set for us by Parliament, and having considered the likely environmental factors that face the UK over the next strategy period and beyond, the Board agreed to refresh and reinvigorate the FSA pledge:

We will put consumers first in everything we do.

1.4 In consultation with consumers we identified three consumer rights to underpin our work:

- The right to be protected from unacceptable levels of risk.
- The right to make choices knowing the facts.
- The right to the best food future possible.

1.5 Consumers sometimes tell us that they feel powerless in their relationship with food. We want consumers to be and feel powerful – able to contribute effectively to shaping a food system that protects their interests and respects their rights. Regulation and how we work with businesses has an absolutely critical role in supporting the achievement and protection of these rights.
1.6 Within our key areas of focus ("safe and what it says it is") we engaged with a wide range of stakeholders and developed a definition of our respective roles and responsibilities.

It is the responsibility of people producing and supplying food to ensure it is safe and what it says it is … and the Food Standards Agency has a key leadership role in making sure they step up to that responsibility. It is a responsibility of consumers to manage the risks relating to food that they can affect. They have a right to be informed and supported in responding to those risks. The Food Standards Agency has a key role to play in making this happen.

1.7 These roles and responsibilities and the objective of the FSA as set out in our founding legislation (see above) will drive our approach to regulation in the national and international context.

1.8 Regulation is a means to an end – protecting consumer interests in relation to food - not an end in itself. It is not the only means that we will use to achieve the objective – others will include working directly with consumers, and working with other government departments and international bodies to support consumer interests. As our stakeholders told us during the engagement we had with them on the overall Strategy, though, regulation remains a critical element of our work to protect consumer interests.

2 DEFINITIONS

2.1 Regulation is a key tool for how governments achieve their wide range of policy objectives. Governments use a range of regulatory approaches and powers, reflecting the complex and varied needs of their citizens, communities and economy.

2.2 The Better Regulation Task Force (BRTF) produced a broad definition of regulation to accompany its five principles of good regulation. It states that "Regulation may widely be defined as any government measure or intervention that seeks to change the behaviour of individuals or groups". The BRTF illustrated this definition by going on to say "It can both give people rights (e.g. equal opportunities) and restrict their behaviour (e.g. compulsory seat belts).

2.3 The OECD’s view is that “a high quality regulatory environment is an essential foundation for all nations to be an enjoyable and prosperous place to live.

---

work, and do business, whilst protecting the environment and all parts of society. High performing regulators play a key role in achieving these outcomes, whilst also encouraging innovation and fostering productivity and growth.²

2.4 The FSA Strategy defines roles and responsibilities. The regulatory strategy is mainly concerned with responsibilities that relate to businesses and our role in ensuring they step up to those responsibilities – be it by supporting them (for example building on the success of Safer Food, Better Business), or where necessary pressurising them effectively or compelling them to do so.

*It is the responsibility of people producing and supplying food to ensure it is safe and what it says it is ... and the Food Standards Agency has a key leadership role in making sure they step up to that responsibility.*

2.5 In a changing landscape, the FSA will need to take a broad definition of what we understand our regulatory role to include. In this context, our regulatory role is not just the activities and actions that are required of us in food and feed law, but includes *all possible interventions* that we, or others acting on our behalf, could take, in relation to businesses, to secure our desired outcomes for consumers.

2.6 The FSA will therefore use a broad definition of regulation in our considering our future regulatory role.

3 PRINCIPLES

3.1 We will put consumers first in everything we do. The distinctive feature of our Regulatory Strategy is that it is neither pro nor anti regulation, but understands regulation as one of a tool box of options to apply to seek to deliver consumer benefits.

3.2 We will be open to using a wide spectrum of actions and interventions to deliver our regulatory responsibilities and strategic objectives to influence businesses for the benefit of consumers. Where only compliance is acceptable, legislative regulation may be appropriate, backed by effective and deterrent sanctions; where the desired impact is an improvement in behaviour, influence through consumer or peer pressure may be better; where the desired impact is to encourage others to adopt good practice, then sharing information may be the best intervention.

3.3 We will seek to align incentives and disincentives for food businesses with the interests of consumers. When incentives are aligned, our future approach will be less dependent on the current system of official checks, inspections and controls and this will enable us to focus our resources on the areas of highest risk/potential impact. Effective disincentives are an important part of this - where businesses are persistently non-compliant, we will use more robust

escalation procedures and dissuasive sanctions to secure the right outcomes for consumers, either through sustained improved performance, or by preventing these businesses from operating if they cannot or will not improve.

3.4 **Our focus will be on the outcomes we are seeking to achieve, keeping an open mind about the means by which those outcomes are achieved.**

3.5 **Our future regulatory approach should be truly risk-based and assessed in terms of impacts.** That means that our greatest efforts should be focused on the areas and issues that pose greatest risks to consumers and where we can deliver the greatest consumer benefits through our interventions.

3.6 **We will differentiate between the FSA’s regulatory functions in relation to food law compliance and our broader objectives.** These broader objectives are on behalf of consumers but also concern businesses, for example supporting economic growth objectives.

3.7 **We will use our powers to deliver our strategic objectives - which go beyond our regulatory responsibility in respect of verifying compliance with food law.**³ Our future Regulatory Strategy should include using these powers to inform and influence consumers, industry, other regulators, Ministers and others in pursuit of those objectives.

3.8 **Government intervention (including legislation) is warranted where its benefits to the public are proportionate to the costs/disbenefits of its application.** We will use evidence, knowledge and judgement to identify the core of legislation around food safety and standards that delivers benefits, so that we know those areas we require business compliance.

3.9 **The costs to businesses of regulation are no more than they need to be.** The price of food is affected by the costs of regulation and compliance, so to protect consumers’ interests in terms of affordability, we have a responsibility to ensure that costs of complying are kept to a minimum, and where food law does not deliver benefits for consumers, we should seek to minimise its impacts and cause it to be removed.

3.10 **It is not the FSA’s or LAs’ role to achieve compliance – that is clearly defined in law as the responsibility of business.**⁴ Our role is to verify that food businesses are complying with their legal obligations to produce food that is safe, and what it says it is.

4 **CONTEXT**

4.1 The Strategy recognises that many factors will affect the supply of food over the next 25 years and beyond. It predicts increased pressure on our food

---

³ As defined in the Food Standards Act 1999, article 6: 1) The Agency has the function of (a) developing policies (or assisting in the development by any public authority of policies) relating to matters connected with food safety or other interests of consumers in relation to food.

⁴ Recital 30 and Article 17(1) of Regulation (EC)178/2002.
supply in future. As the Strategy needs to guide us in addressing the changes that materialise in that period, and help us be more prepared for the changes that follow later, our regulatory strategy needs to be designed to be effective in protecting consumers in this changing landscape.

4.2 There is evidence of growing pressures on the current delivery models for official controls in the UK, which relies mainly upon local authorities and the FSA itself. In the context of likely pressures on public services over the period of the Strategy, it is a realistic assumption that the resource pressures on the current delivery models will increase, alongside the increased pressures on the food supply system. It is important that we are taking action now to mitigate the effects of these pressures, to ensure that we are better placed to secure our desired strategic outcomes for consumers.

5 OUR FUTURE REGULATORY APPROACH

5.1 To achieve our strategic goal of protection of consumers' rights in relation to food in a rapidly changing landscape, we will need to make changes to what we do. Regulatory functions should not be about repeating what is already being done by others. We need to take account of all available, robust and relevant means of gaining assurance that a food business is meeting its obligations.

5.2 We will expect businesses to demonstrate and provide evidence of compliance with food law, and our role should be one of checking and challenging that evidence.

5.3 Where we are satisfied that information and evidence are robust and reliable, we should not repeat the activity of others. This will require us to rethink our approach to audit and information gathering, and links closely to the need for us to improve our information systems and management capability, and our analytical capability. We will encourage industry and other regulators to share information so we can work more collaboratively and with greater targeting of effort to areas of greatest risk.

5.4 To secure better outcomes for consumers and businesses, this approach will represent a significant shift in focus, from repeating largely routine, programmed work, to a more intelligence, risk and impact driven approach using all available flexibilities within the regulatory framework, which actively seeks to identify emerging risks, gaps in knowledge, as well as identified areas of concern and non-compliance.

5.5 We will acknowledge the important role of culture and leadership in delivering consistent compliance and business behaviour that is in the interests of consumers, and we will improve the rigour with which we are able to assess “confidence in management”. Where we conclude on the basis of the evidence that consumers are unable to have confidence in management to protect them from detriment we will apply our existing powers, and if necessary seek new ones, to reduce the consequent risk to an acceptable
level, including barring individuals from involvement in food businesses in particularly bad cases.

Incentives

5.6 We need to be clear about how we will supervise the application of the rules and the sanctions and penalties that are available and appropriate for failure to comply. These are elements of our regulatory strategy – tools in our regulatory toolbox. The most effective way, however, for government to achieve desired outcomes is through using its powers to align the incentives that encourage others to behave in ways conducive to the desired outcomes.

5.7 We have scope and capacity to make greater use of reputational and administrative incentives to motivate businesses to deliver outcomes for consumers’ benefit. We are currently using incentives to drive businesses to behave in ways that benefit consumers, e.g. FHRS/FHIS ratings and publication of results from the Campylobacter retail survey. We will continue to use openness and transparency as incentives to deliver consumer protections, and we will also continue to value the transparency facilitated by others such as Which?.

5.8 We should make increasing use of appropriate and aligned incentives to both ensure compliance and encourage good practice through encouraging culture change within food businesses where appropriate, as well as through our own interventions.

5.9 We must also consider the balance between reward and penalty. If meeting a given standard is a priority, then emphasising the penalty associated with not meeting that standard may be appropriate. Or, if we want businesses to commit to good practice or outstanding performance, then placing greater emphasis on recognising and seeking to reward that performance may be more appropriate.

5.10 Many regulators are developing approaches to move away from solely ‘command and control’ regulation. The Environment Agency is making effective use of industry’s data in how it licenses and regulates waste and emissions. The UK’s advertising regulatory system is a mixture of self- and co‐regulation, where the system is paid for by the industry, which also writes the rules, but those rules are independently enforced by the Advertising Standards Authority (ASA). The ASA believes this is a sign of a considerable commitment by the advertising industry to uphold standards, but ASA can deploy effective sanctions when industry doesn’t comply with these standards. It is important that the FSA learns from other regulators as we develop new approaches.

Regulatory Tools

5.11 We will draw from a broad spectrum of regulatory approaches in delivering both our legislative responsibilities as well as securing our wider strategic outcomes on behalf of consumers. These range from how we build coalitions
and influence others to do things, and using approaches such as industry
guides, through to rules-based legislation where this is warranted. This
spectrum will represent a range of approaches and interventions that will be
used either ourselves, or by others on our behalf.

5.12 The right information and systems for information management and sharing
will be essential to underpin our work, as interventions will only be effective
when founded on reliable information, effectively analysed. That information
may be the FSA’s, or it may belong to others – for example industry, other
regulators, or third parties. Our work on regulation will be taken forward in
tandem with our work on information and analytics.

5.13 Our future regulatory approach should move progressively to be truly risk-
based. The Board has previously supported a risk-based approach to
regulatory interventions, through the Compliance and Enforcement Strategy5.
FSA and local authorities already apply risk-based interventions, for example
through the risk-rating of premises in the FSA’s Code of Practice, and in how
we determine the frequency of audits for approved meat premises. We know
that local authorities are targeting resources on higher risk premises and
those with poor compliance. Risk-based approaches can be applied either by
ourselves or through assurance gained by others, for example using
appropriate accredited assurance schemes, where these can demonstrably
and reliably provide appropriate consumer protections.

5.14 Being confident in the robustness and reliability of information, regardless of
who generates or owns that information, would allow us to develop a more
‘delivery agnostic’ approach – one where if we can be reliably assured about
what businesses are doing to ensure they meet their obligations to
consumers, we can be less directive on systems and structures. This would
allow us to work with others to develop models that could be alternative or
complementary to the current model that would be sustainable for the future.

5.15 To achieve all our strategic goals, and optimise the effectiveness and impact
of our regulatory approach, several different forms of delivery may be
required. We will be considering a range of delivery and funding models that
may be applicable in future.

5.16 The question of where regulatory costs fall is closely linked with ongoing work
in Europe to replace Regulation (EC) 882/20046 on official controls with a new
Regulation on official controls and other official activities7. This Regulation will
contain the future legal basis for charging for official controls, and whilst the

---

on official controls performed to ensure the verification of compliance with feed and food law, animal
health and animal welfare rules
7 Proposal for a regulation of the European Parliament and of the Council on official controls and other
official activities performed to ensure the application of food and feed law, rules on animal health and
welfare, plant health, plant reproductive material, plant protection products
UK is seeking to secure as much flexibility as possible in how, when and where to charge, our future approach will be determined by what is legally permissible in EU law. Progress with these negotiations and subsequent implementation planning will need to be aligned with our wider approach to regulation.

6 FSA AS CENTRAL COMPETENT AUTHORITY

6.1 Our pledge - that we will put consumers first in everything we do – must be seen alongside our role as Central Competent Authority (CCA). Our role as CCA requires oversight for a large body of legislation, mainly grounded within the EU arena. To enable the UK food industry to compete fairly within the single market and beyond, we need to ensure compliance with relevant legislation, and work collaboratively to seek to change elements of the regulatory stock that we believe do not provide clear benefits for consumers.

6.2 The Strategy to 2020 implies a stronger campaigning focus into international regulatory systems to effect the changes we want to see for the benefit of consumers. The FSA is effective in Europe, and has been successful in helping secure regulatory changes that reflect modern food safety challenges, but we need to have greater influence in European and international regulatory systems that apply to food. Our engagement strategy therefore needs to cover the relevant EU and international institutions.

7 WIDER ENGAGEMENT

7.1 Engagement on our regulatory approach has been an integral part of our wider engagement on the FSA's Strategy. The next stage will be a programme of engagement to discuss these principles in more detail with a wide range of stakeholders to identify possible improvements to the approach, understand benefits, costs, risks and opportunities and also any potential unintended consequences.

8 CONCLUSIONS

8.1 This paper describes the direction of a future Regulatory Strategy for the FSA. It is our view that significant change is required from our current regulatory approach to secure the outcomes that our new Strategy wants to achieve for consumers, whilst still fulfilling our EU and domestic legal obligations. This approach is likely to require cultural and organisational change, using a broader definition of regulation, applying a wider range of tools and interventions, and developing sustainable delivery and funding models for the future.