**The proposed approach for the amendment of Northern Ireland domestic legislation relating to food and feed safety and hygiene, food compositional standards and food labelling (including nutrition) - summary report of stakeholders’ responses**

1. The proposed approach for the amendment of Northern Ireland domestic legislation relating to food and feed safety and hygiene, food compositional standards and food labelling (including nutrition) consultation was issued on the 22nd November 2018 and closed on the 20th December 2018.

2. The purpose of the consultation was to seek comments from food and animal feed businesses including manufacturers, wholesalers and retailers, and enforcement authorities on technical amendments to domestic legislation applying in NI and to ensure that this legislation remains operable after the UK has left the EU.

The consultation may have also been of interest to health professionals, consumer groups and others with an interest in food and feed legislation. These stakeholders were all included in the consultation.

**Background**

3. The FSA in NI was consulting on proposed technical amendments to domestic legislation relating to:

1. Food and feed safety and hygiene (including the safety aspects of food standards i.e. food additives);
2. Food compositional standards and labelling; and
3. Nutrition labelling.

The amendments do not result in a material change in the level of protection the NI domestic legislation provides to human health, or to the high standards of food and feed (including the provision of food information labelling and nutrition labelling) which consumers expect.

Most amendments are minor technical fixes which do not equate to a change in policy and will a cover range of issues for example, concerning the correction of references to the EU or Member States, which will no longer be appropriate post EU Exit, and removing references to payments in Euros.

In addition to these minor technical fixes, more substantial policy options needed to be considered for honey and natural mineral water. The proposed options explained in the consultation would apply if the EU and the UK were not to agree a partnership arrangement and common approach to food legislation after the UK leaves the EU.

For further details on the proposed amendments consulted upon, please see link:

<https://www.food.gov.uk/sites/default/files/media/document/domestic-legislation-in-ni-consultation-letter.pdf>

**Responses**

4. The FSA received two stakeholder responses to the consultation which offered a range of comments. The FSA is grateful to those stakeholders who responded. These responses and the FSA’s response to the comments can be found at annex A.

**ANNEX A:**

**Summary of Substantive Comments to the FSA Consultation - The proposed approach for the amendment of Northern Ireland domestic legislation relating to food and feed safety and hygiene, food compositional standards and food labelling (including nutrition)**

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| --- | --- | --- | --- |
| **Stakeholder** | **Method** | **Stakeholder Response** | **FSA Response** |
| Ulster Beekeeping Association – Private individual  | Email | Regarding blended honey from several countries I would support Option 2 -  "A blend of honey from more than one country"The members of the Ulster Beekeeping Association also produce their own honey in Northern Ireland and they assume that it will be possible to label honey solely from Northern Ireland as Product of Northern Ireland? | FSA has noted these comments and they were taken into consideration at part of the consultation. |
| Northern Ireland Retail Consortium (NIRC) | Email | **Country of Origin for Honey -** **Support of option 1 – No change** This is our preferred option, as it is the one which will require the least amount of change. The only labels which will require changes are those containing UK honey where the origin is not given as a country but as EU. For products which are 100% UK honey, the origin will be given as UK or non-EU. For products with a blend of honeys from different European countries including the UK, the label will state EU and non-EU. This option is aligned with the European provisions which our members will be required to comply with, when exporting to other countries. This will enable them to avoid having a separate label for the UK market and exports into Europe. This is the least burdensome and costly option for retailers.**Natural Mineral Waters –** **Support of option 1 – Rolling over of recognition of existing EU natural mineral waters.** This is the least disruptive and burdensome option, as it will require no changes to the current practices. If the European natural mineral waters currently listed were removed, our members would be required to discontinue products. We believe it is very important that the FSA supports DEFRA to persuade Europe to maintain the UK natural mineral waters in the European legislation, since many of these products are currently exported into European markets.**Any additional comments** We urge FSA to liaise with all other Government departments responsible for aspects of food labelling (DAERA, DEFRA DHSC and BEIS) and coordinate all label changes, so businesses do not need to address every single change individually but can coordinate a minimum number of label changes. The lack of coordination will result in exorbitant cost and will become very difficult for our members to manage. We support the need to consider the practical elements of a labelling change for domestic product. However, it is also important to understand how product produced under the transposed UK legislation will be viewed if exported to EU and non-EU countries. Without clarity or agreement on the terms of mutual recognition, there remains uncertainty for businesses that continue to trade with the EU on any additional considerations or changes for their product. | FSA has noted these comments and they were taken into consideration at part of the consultation. |