

A REVIEW OF THE FOOD STANDARDS AGENCY'S INTERNATIONAL STRATEGY

Report by Steve Cowperthwaite

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1. Summary

- 1.1. The FSA undertakes a considerable amount of international engagement beyond the EU, reflecting the increasingly global nature of food supply systems and of international regulatory standards. However, the FSA's current approach to wider international work has been largely opportunistic.
- 1.2. Within this context it has been recognised that our international engagement should be more focused and strategic, not least since the FSA is a comparatively small Department and therefore cannot waste effort. We need to ensure that everything we do, when we work internationally, is coherent and in pursuit of our wider goals. Therefore, we need a clear strategy and then a plan to deliver that strategy, enabling the FSA to concentrate its efforts in areas that make the greatest difference, both bilaterally and multilaterally.
- 1.3. We are now taking this opportunity to update the Board regarding a review of the FSA's existing international strategy and the proposed path for delivering a more strategic and coherent approach to the FSA's international engagement.
- 1.4. This paper also provides an overview of the FSA's key past and existing international activities to date, demonstrating how the FSA is currently regarded internationally, how we have been building the FSA's profile in the last few years, the areas where it has already paid dividends and opened doors and also opportunity areas that we will be seeking to grow and build on as part of a revised strategy.

2. Why the FSA works internationally

- 2.1. At the most basic level, we depend on other countries for much of the food we eat. The FSA therefore has a strong interest in encouraging and helping other countries to improve their food safety and food standards and, more widely, in developing global standards and systems to protect public health and the

consumers' wider interests in relation to food.

- 2.2. The FSA's Strategy to 2020 clearly identifies that food, and the regulatory framework that governs it, are heavily globalised and interdependent. The overwhelming majority of the UK's food policy is shaped and regulated by EU law, which in turn is influenced internationally by the Codex Alimentarius Commission¹.
- 2.3. Through the FSA's international engagement, the UK plays its part in influencing issues that countries collectively have decided need a global solution, or where countries work bilaterally to deliver common goals, such as working with our international partners to deliver robust, science-based food standards to facilitate global trade and consumer protection.

3. What the FSA aims to achieve at international level

- 3.1. The UK is internationally regarded as a leader in food safety and standards, and as an innovator. As we exit the EU, the FSA firmly intends to maintain the UK's leadership position, and we see opportunities for the FSA to move faster, smarter and more effectively into the future.
- 3.2. Our ambition is to be recognised, at home and abroad, as an Excellent Accountable Modern Regulator. The public trusts the FSA to do its job, but the changing nature of the food system through globalisation, diversification, technology and changing consumer habits are all challenging the assurance system as we know it. That system is not sustainable and the regulatory regime needs to change or we put public trust in jeopardy.
- 3.3. Getting the new regulatory model right will, in turn, give us more scope to protect consumers within the rapidly evolving global food system, and widen our international influence on modern food standards.
- 3.4. Getting the future regulatory model right is also inextricably linked to EU exit. Once outside the EU, we will have to assure all our trading partners that a robust and effective regulatory model is in place. We therefore need to be alert to international developments and to maximise our impact as a department internationally including through building a network of contacts around the world to make sure that FSA messages can reach a wide audience.
- 3.5. Given the various overlaps reflected across the different regulations and standards that govern the supply and safety of food, many countries have become

¹ Codex is a body founded in 1963 by WHO and FAO on food standards; its main objectives are to protect the health of consumers and to ensure that international practices in the trade of food are fair

interested in exploiting synergies, identifying common food safety objectives and removing duplication of effort thereby helping to reduce costs whilst continuing to promote global food safety. Our regulatory reforms will enable innovation, helping food businesses gain traction in international markets, and promote international cooperation.

4. The review of the FSA International Strategy

- 4.1. To suit our changed international context as we plan for leaving the EU, we are undertaking a review of our International Strategy to identify smarter and more coordinated ways to approach our international engagement in order to adapt to the rapidly changing world in which we operate.
- 4.2. We have brought together information about the FSA's past and existing international and EU activity to form a solid plan for action that aligns with the FSA's strategic objectives.
- 4.3. The revised International Strategy will help deliver the priorities set out in the FSA's Strategic Plan 2015-2020 through effective international engagement, positioning the FSA as a world leader for approaches to regulatory modernisation in food safety, and enabling us to focus our resources where we can have the biggest impacts.
- 4.4. We will also be mapping core International and EU opportunities and utilising these to demonstrate to trading partners that the UK approach to food safety maintains the highest levels and to provide a strong, distinct and influential voice in the world stage.
- 4.5. This will be achieved by working both directly with priority countries and also indirectly through organisations such as Codex and the Global Food Safety Initiative to grow our influence internationally in food safety and to play our part in developing standards and systems that are in the interests of consumers, that facilitate fair practices in international trade and that support movement of goods more freely.

5. How FSA works internationally

- 5.1. The UK is internationally regarded as a leader in food safety and standards on the world stage and the FSA is already influential and respected, with our expertise and evidence-based approach delivering benefits for consumers, UK businesses and the economy.

5.2. We've ramped up our international influence and, by taking an active role in global standard setting organisations like Codex and the OIE, we have been instrumental in raising international standards and ensuring that the standards adopted are science based.

5.3. Annex A provides some recent examples of FSA leadership at an international level.

5.4. Building on these successes we will:

- Continue to be outward-looking, working with others to improve the quality of public global assets
- Make sure that internationally agreed standards are robust, evidence based and reflect key UK values relating to global food security
- Continue to engage with Codex to offer the extensive technical expertise that the UK holds
- Work with our international partners to deliver robust, science-based food standards to facilitate global trade and consumer protection
- Make sure that UK knowledge and expertise remain at the heart of international decision making, maintaining our influence and respect, such as combatting anti-microbial resistance
- Improve feed and food safety in the global supply chain, identifying and working towards common food safety objectives with our global partners
- Be alert to international developments and anticipate areas where the FSA will need to proactively influence internationally

6. Who the FSA works with on the global stage

6.1. International and EU business is most effectively conducted through personal relationships. We therefore need to maintain, develop and utilise these relationships, working with new and existing partners and countries to drive forward the FSA's international ambitions, work on areas of common interest and promote global food safety and consumer protection.

6.2. We will take a leading position in the world to defend our interests, championing greater cooperation with international organisations and institutions and maintaining the global standards that underpin fair trade.

6.3. The FSA represents the UK in relation to food safety matters and, on a practical level, much of the international expertise lies at official level. It is therefore FSA policy leads who attend the different international meetings and who are best placed to decide, with advice from the EU and International Strategy Team (EUIS), where to target their individual efforts to help progress the various international work programmes. However, it is important to note that international

relations are reserved to Westminster which means FSA conducts this business on behalf of UK ministers answerable to the UK Parliament.

- 6.4. As such, the FSA's position must be consistent with wider Government priorities and is subject to the same core procedures as all Whitehall Departments, including the European Affairs Committee (EAC) write-round procedure, and Parliamentary Scrutiny.
- 6.5. Equally, whilst the FSA represents all the respective parts of the UK internationally in relation to food safety matters, we respect devolution arrangements and work closely with Food Standards Scotland and the devolved administrations in Wales and Northern Ireland.
- 6.6. At the same time we also continue to work with policy and evidence teams from across government, Overseas Territories and Crown Dependencies to develop our negotiating positions for international meetings.
- 6.7. Our delivery partners will be drawn from a broad spectrum, making the best use of UK scientific expertise, research, development and innovation. We will also work with businesses and trade associations, universities and researchers and NGOs to make sure our voice in the world reflects the broadest range of views and expertise and delivers our needs.

7. International visits

- 7.1. International engagement is a two-way process and can happen through a multitude of channels. Alongside working with global standard setting organisations we have fostered relationships directly with key international partners through inbound and outward international visits.
- 7.2. As part of our review we are looking at our processes for facilitating visits to allow for more strategic approach to co-ordination and to ensure that the benefits are fully utilized across the Department.

8. Priority country mapping

- 8.1. We are currently working internally to map the FSA's key interests to different countries, providing a complete picture of our interests. These priority countries will then be mapped to assess their relative power against interest to the FSA, ranked accordingly and have tailored engagement plans going forwards.
- 8.2. The FSA already has Memoranda of Understanding (MOU) with the QUAD countries of USA, Canada, Australia and New Zealand and we will look to review

these MOUs to strengthen our links with these countries on matters of common interest

8.3. The UK's future relationship with the EU is to be agreed. The FSA is not covered in this paper.

9. Conclusions

9.1. The UK is internationally regarded as a leader in food safety and standards, and as an innovator. As we exit the EU, the FSA firmly intends to maintain that leadership position, and we see opportunities to move faster, smarter and more effectively into the future. Our regulatory reforms will help food businesses gain traction in international markets. The ambition for the FSA is to be regarded as an excellent, accountable, modern regulator.

9.2. We believe the review and revision of our international engagement will enable us to be more focused and strategic, allowing the FSA to concentrate its efforts in areas that make the greatest difference, both bilaterally and multilaterally.

9.3. To underpin our ability to successfully operate internationally, build on the FSA's successes to date and grow our international presence we will be introducing stronger governance arrangements including appropriate tools to more effectively track the benefits of our activities and clarifying on the role of the EUIS team.

9.4. These will facilitate the EUIS acting as central focal point for the FSA's international activities, working closely with FSA officials, who are well placed to decide where to target their individual efforts to;

- Provide the strategic leadership and co-ordination of the FSAs international work
- Support the delivery of international priority areas set out in the strategic plan
- Provide advice and a challenge function to the department
- Lead a review of the FSAs International/EU skills capability to improve resilience within the Agency, develop a list of skills officials who work in an international or EU context need and to introduce appropriate opportunities to upskill FSA officials, both internally and as part of wider cross-Whitehall solutions

9.5. The next steps will be to draft a revised high-level strategy, which will include the overarching vision, high level aims/purpose, how we intend to achieve these and what the measures of success will look like. It will also identify short, medium

and long-term goals. This will begin with an internal workshop at the end of February with key FSA international policy leads to agree the scope of the high level aims and ensure that it covers all the work the FSA is doing internationally. We will also be using this opportunity to map core International and EU opportunities to identify and target where we can best seek to widen our international influence on modern food standards.

9.6. The draft high-level strategy will be available by the end of April.

10. Whilst the high-level Strategy will be designed as a working document that can be refined over time to flex with the changing external demands, we are nonetheless confident it will ensure the FSA is well equipped to deal with the challenges and opportunities ahead.

Annex A – Recent examples of FSA leadership at an international level

Codex

The UK is playing a leading role in facilitating global free trade and promoting consumer protection and Codex is a key part of this. Some notable Codex successes for the FSA include:

Successful election of Director of Policy Steve Wearne to vice chair of the global Codex Alimentarius Commission, and the value this will add as we step away from the EU bloc.

In his election material Steve's 'Codex Vision' focused on three key areas Participation, Credibility and Strategy:

- For an inclusive, transparent and robust Codex that is respected throughout the world for its commitment to consensus driven and science based food standards.
- For Codex standards that protect consumer health, support fair practice in international trade, and help to provide safe and affordable food for developed and developing countries, now and in the future.
- For a new strategic plan that equips Codex to deal with current and future challenges along the entire food chain and helps further cement Codex as the pre-eminent global food standards setting body.

Leading on:

- **UK continues to steer work on AMR including as a co-chair of the electronic working group drafting the revised Code of Practice**
- **UK Chair of Codex Committee on Food Hygiene's 'General Principles of Food Hygiene and HACCP electronic working group and the physical working group at CCFH49**
- **UK Chair of CCFICs electronic working group on the role of third party assurance;**
- **UK member of the Codex Committee on Food Labelling's 'Non-retail containers electronic working group**
- **UK member of the Codex Committee on Food Hygiene's 'Histamine electronic working group'**
- **UK lead on CCMAS electronic working group on criteria approaches for methods which use a 'sum of components'**
- **UK is the lead (Chair) on Codex Committee on Food Labelling 'Internet sales' discussion paper**
- **UK is assisting Australia and USA on development of CCFL allergen labelling discussion paper**

International visits

These visits enable us to deepen our understanding of different approaches to regulatory systems, informing and developing key areas of work for the FSA. Recent trips to Canada by representatives from RoF and Operations have utilized and built on connections made during previous trips. Operations had the opportunity to visit high-volume meat plants, meet with the Canadian Food Inspection Agency and the Canadian Pork Council.

ROF attended the Annual Conference of Canadian Federal Regulators; a Risk Based Regulatory Delivery workshop with PRISM Institute, Canadian Officials and academics, International regulators; and held a series of discussions with Ottawa Provincial regulators and business associations. Through these engagements ROF was able to explore approaches to reforming, modernising and transforming regulatory frameworks.

We also share our expertise and approach to support capacity building in other countries. For example, a senior level delegation from Food Safety and Standards Authority India have recently benefited from a week-long visit to the UK designed to give them an overview our food safety regulatory system.

They also create a platform for discussing areas of mutual interest and cultivation of relationships and the recent international visits all demonstrate this. Jason Feeney, Steve Wearne and Geoff Ogle visited the USA meeting regulators (Food and Drug Administration), industry (Cargill and Wegmans) and attending a Codex Committee meeting, promoting the FSA's work particularly with RoF and learning from the differing challenges and approaches to food safety in the US. In turn we have also recently hosted visits from Australia (Dairy Food Safety, Victoria), China (Chinese Food and Drug Administration, with whom we are developing a Memorandum of Understanding) and New Zealand (Ministry for Primary Industries of New Zealand), during which we were able to sign an updated Memorandum of Understanding.

NFCU and Global Alliance

In recognition of the global nature of the food industry and the resulting necessity of a global response to food fraud the NFCU has put emphasis on its international work. Their key achievements to date have been;

- Creating the Global Alliance (GA) on food crime to 'help co-ordinate and strengthen international activity to prevent, detect and disrupt serious crimes of dishonesty in food supply chains'.^[1] It's initial membership includes USA, Canada, New Zealand, Australia and the UK with the UK chairing for the first three years. The ambition is to ultimately build member countries to 22, first expanding to 1 country per continent and then 1 per United Nations region. The initial meeting is scheduled for the end of May 2018.

- Establishing the NFCU as global thought leaders in food fraud, supported by numerous speaking engagements across the world including Brazil, US and multiple countries in Europe. Notably at the first 2 (in Quebec and Beijing) of a series of 3 conferences on food fraud.
- Providing technical specialist support to work Michigan State University are undertaking to develop a country level risk assessment methodology.
- Annual participation in the joint Europol and Interpol 'Operation Opson' where 60 countries focus on food crime for a defined period and the results are collated into an overarching report