

# **Annex 3: Current FSA and Defra activities highlighted during WG6's work that aim to address potential food and feed safety issues raised in the report.**

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## **Recommendation FSA/Defra activity**

1. Maintains active surveillance of likely areas of production changes in response to net zero carbon policies and encourages food and feed businesses to embed responsibility for food safety into their innovative practices following PAS 440 principles.

**FSA** - Our Food 2021: An annual review of food standards across the UK

also includes an assessment of compliance against food law requirements.

**FSA** - Novel foods and processes (including novel proteins such as insect) will need to be assessed as novel foods before being placed on the market. Novel foods need to pass a safety assessment before going on sale in the UK and that includes considering the allergenic potential of that food.

2. Develops guidance which will ensure safe food at the site of production through active engagement with new food-producing technologies (e.g. vertical farming, novel proteins such as insect rearing and cultured meat.)

The FSA has commissioned a wholesale review of the Novel Foods Regulatory Framework, identifying and critically evaluating a range of potential regulatory models, taking into account the UK regulatory landscape and drawing on international best practice and stakeholder views. The review is due to be completed by spring 2023 which will help inform guidance for novel food applications and stakeholders, later in 2023.

The FSA is currently expanding its stakeholder engagement function to maintain ongoing dialogue with the industry. This includes dedicated Account Managers and our plans for a single point of contact under the new Case Management System (CMS) which is due to go live in spring 2023. CMS will also provide applicants more support at the front end of the service and there will be a number of steps prior to applicants submitting a new application to help them establish what information is essential for their application to progress.

3. Develops and communicates advice for primary producers and consumers on how to minimise food safety risks when producing or consuming foods that they perceive as contributing towards net zero carbon or sustainability agendas (e.g. recycling of food by-products, reuse of packaging, foraging).

**FSA** - Containers for re-use must be designed for repeated use and are subject to food Contact Materials legislation. Testing based on expected use of the final article must be carried out on plastic food contact materials.

FSA has prepared consumer [guidance for foraging](#) that was published in January.

4. Engages with other government departments to assess the effectiveness of current regulation, enforcement, codes of practice and guidance in assuring future food safety and, given the changes to primary production practices described in this report, whether the balance of these assurance mechanisms is appropriate.

**Defra** - As part of the Government's Food Strategy, Defra will work with the FSA to develop dedicated guidance materials for approval of alternative protein products as part of the review of novel food regulations.

The Environment Agency's sludge strategy is available at <https://www.gov.uk/government/publications/environment-agency-strategy-for-safe-and-sustainable-sludge-use>

5. Ensures that the regulatory framework for animal feed is sufficiently agile to cope with fast-moving changes and accompanying risks arising from the many innovative net zero carbon developments including new and novel protein sources, food waste recycling, by-product/co-product use and new supplements.

**FSA** - The FSA Advisory Committee on Animal Feed (ACAF) assesses any new feed or ingredients in feed.

Recycled food (not of animal origin) falls under FSA animal feed legislation, but recognised Animal By-product and Transmissible

Spongiform Encephalopathies (TSE) legislation means Defra lead where products of animal origin (POAO) are included.

6. Rapidly establishes whether the current risk analysis and regulatory frameworks in place are able to cope with the novel proteins and cultured meats that might find their way into food and feed.

**FSA** - Novel foods and processes (including novel proteins such as insect) will need to be assessed as novel foods before being placed on the market. Novel foods need to pass a safety assessment before going on sale in the UK and that includes considering the allergenic potential of that food and the risk of contaminant transfer from feed substrates.

The current regulatory framework inherited from the EU considers the safety assessment of new products. ACNFP independently reviews safety assessments. The authorisation process also has a requirement to publicly consult on the risk management opinions prior to the FSA making recommendations on authorisations.

A limited number of insect species are currently permitted on the market under transitional measures but applications for authorisation, including evidence on safety, will need to be submitted by 31 December 2023 for these insect species to remain on the market.

**Defra** – The existing regulatory regime for the manufacture and placing of fertilisers on the market in the UK is fragmented and does not cover organic or recycled nutrients and newer types of fertilisers that are used in combination with traditional fertilisers to improve nutrient use efficiency. A new framework is under development to streamline statutes and smooth the route to market of new and innovative products that are less polluting to the environment or are less resource intensive in their manufacture. Consultation on the new framework is planned in 2023.

7. Reviews the potential impacts on food safety arising from the use of organic wastes and food by-products applied to land to determine whether current regulatory frameworks are fit for purpose as companies and consumers move towards net zero carbon.

Current research under Defra’s agri-food evidence portfolio aims to establish baseline data on levels of potentially toxic elements (PTEs) in mineral fertilizer products sold in England and to appraise the domestic implications of setting or reducing thresholds of PTEs across the EU and within the UK. It will also explore the presence of a broader range of contaminants in inorganic and organic fertilisers including waste-derived products.

The Environment Act 2021 requires local authorities in England to arrange weekly collection of food waste for recycling or composting. Anaerobic digestion is the government’s preferred route for treating food waste. Defra is working with stakeholders, including industry and local authorities, to expand the capacity for food waste treatment in England. It is also working closely with the BEIS who lead the Green Gas Support Scheme (GGSS), which is incentivising the building of new anaerobic digestion facilities.

**FSA** - Hygiene and contamination team continue to work with Defra where

any changes they propose could have food safety implications.



8. Undertakes a systematic analysis of research gaps to identify where scientific evidence is needed to understand the risks and benefits associated with production and consumption of food and feed in a low carbon economy.

The added challenge of a food supply “that is healthier and more sustainable” should not be underestimated in the context of the above recommendations and necessitates a strong programme of horizon scanning and analysis to stay ahead of technological, commercial and social developments

**FSA** - Recently published a piece on the future of animal feed that is focused on sustainability impacts [The Future of Animal Feed: Acknowledgements | Food Standards Agency](#)