

**SUSTAINABLE DEVELOPMENT AND THE FOOD STANDARDS AGENCY'S POLICIES****Executive Summary**

1. The Agency's Draft Strategic Plan 2005 – 2010 included an interim position on sustainability. The outcome of the public consultation on the Draft Strategic Plan showed support for the Agency to embed consideration of sustainable development in its work. This paper, which discusses how sustainable development could be characterised in relation to the Agency's work and proposes an overarching position statement, takes account of the consultation responses and the earlier Board discussion in May (paper 04/05/03). A mechanism for embedding sustainable development into the Agency's policy development, decision making and advice is also proposed, together with an implementation timetable.
2. The Board is asked to:
  - **agree** the characterisation of sustainable development as it relates to the Agency (paragraphs 3 – 5);
  - **agree** the overarching position statement on sustainable development and the chapter for incorporation into the Strategic Plan for 2005 – 2010 (paragraph 16 and Annex A);
  - **approve** the proposed mechanism by which sustainable development will be embedded into the Agency's work (paragraphs 18 – 21 and Annex C);
  - **approve** the proposed timetable leading to the implementation of the proposed mechanism (paragraphs 22 – 23 and Annex E).

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## **SUSTAINABLE DEVELOPMENT AND THE FOOD STANDARDS AGENCY'S POLICIES**

### **Issue**

1. The Board's agreement is sought to the approach that the Agency should take to sustainability and the mechanism for implementing that approach.

### **Strategic Aims**

2. It is proposed that incorporation of sustainable development considerations into the FSA's work should be set out in the chapter, "How we will do it", in the New Strategic Plan. The proposed text is at Annex A.

### **Background**

3. In May 2004 the Board discussed sustainable development and issues that it raises (paper 04/05/03). Two aspects were covered:
  - assessing the sustainability of the Agency's policy development, decision making and advice;
  - the sustainability of how the Agency runs its business, including estates management and the Agency as an employer.
4. It was emphasised that the Agency's approach to sustainable development had to be consistent with the Agency's role of protecting consumers' interests in relation to food. The Board also noted the need to remain focussed on the Agency's core remit in relation to food safety and standards, nutrition and helping consumers to make informed choices. It was highlighted that the fundamental approach in relation to sustainability would be to consider whether the Agency's policies and activities were themselves sustainable.
5. Much of the current paper focuses on how to embed sustainable development into policy development, decision making and advice. This is not at the expense of estates management and personnel functions. These aspects are included in the proposed targets for the New Strategic Plan (Annex A), and will be reported on in the normal business planning cycle.

## **The Government's approach**

6. It is Government policy that all Departments integrate sustainable development into all of their activities and policies. In Wales, the Welsh Assembly Government has a statutory duty to promote sustainable development. The UK Government, together with the devolved administrations has recently conducted a major consultation exercise, "Taking it on". The aim is to give a renewed impetus to sustainable development and to have a new UK Strategic Framework and UK Government Strategy in place by spring 2005.
7. Another key development is that sustainability considerations have been fully incorporated into Regulatory Impact Assessments (RIAs). Other Government Departments now focus on RIAs as a way of assessing sustainability issues during policy development.

## **Outcome of the consultation on the New Strategic Plan**

8. The draft New Strategic Plan set out an interim Agency position on sustainability. A summary of the comments made by stakeholders on this interim position are set out in Annex B. Board paper 04/10/03 will deal with all consultation responses that are not related to sustainable development.
9. The consultation revealed broad support for embedding sustainable development into the Agency's work. Some suggested that sustainability should be a specific priority in the New Strategic Plan, in the same way that food safety and eating for health and well being are. However, sustainability should be taken into account in the development of all of the Agency's policies, and therefore it is not appropriate to set it apart in this way.
10. Some consultees argued that it was important to set targets. Taking into account sustainable development in the Agency's work is about process. It is therefore proposed that process based targets are included in the New Strategic Plan (Annex A).
11. The question arises as to whether the Agency should proactively pursue policies that would promote sustainable development. Consultees were divided on this issue. The Agency's primary task is to protect the interests of both today's and tomorrow's consumers and the proposal is that this should be achieved by taking sustainability into account. The challenge for policy development is how much weight to give to the future as opposed to the present. Proportionality is therefore important.

12. Another key issue raised by several consultees was that the Agency should base its approach on the Brundtland definition, “development which meets the needs of the present without compromising the ability of future generations to meet their own needs”<sup>1</sup>, and include consideration of social, environmental and economic consequences. This is the approach proposed. Several consultees commented on the guiding principles set out in the interim statement. It was stated that these were not comprehensive and didn’t reflect most people’s understanding of sustainable development, although one organisation emphasised the importance of the Agency continuing to be an open regulator. This remains key to the Agency’s approach. The guiding principles were set by the Government in 1999. It is possible that they may be revised by Government following the recent consultation, “Taking It On”, but the final set will not be known until spring 2005. It is proposed, therefore, that the New Strategic Plan should include the current guiding principles, as several consultees found them helpful, but that their position be made clear.
13. Several industry trade associations echoed the Board’s own discussion that the Agency’s position on sustainable development must reflect its primary objective of protecting consumers. However, some consultees, including some consumer organisations, enforcers and individuals, suggested that the Agency should have a broader focus, including in relation to promoting sustainable food production and consumption, and local food.
14. Another key point raised by a number of consultees was in relation to consumer choice. It was argued that the Agency should assist consumers in making sustainable food choices, including through labelling. The Agency recognises that some consumers do wish to consider sustainability issues when making food choices. It is proposed that, as with its approach on assurance schemes, the Agency should expect people making claims about sustainability to make sure that they are evidence based, transparent and that there is consumer involvement.
15. The importance of working with others, including other Government Departments, in order to take sustainable development into account in policy development was also emphasised by several consultees. This point is accepted.

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<sup>1</sup> The full definition is: “development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It contains within it two key concepts: the concept of ‘needs’, in particular the essential needs of the world’s poor, to which overriding priority should be given; and the idea of limitations imposed by the state of technology and social organizations on the environment’s ability to meet present and future needs”.

## **Position statement on sustainable development**

16. Taking into account the earlier Board discussion, the outcome of the consultation on the New Strategic Plan, and the Agency's remit, it is proposed that the overarching position on sustainable development should be:

“The Food Standards Agency will seek to run its business in a sustainable manner. The Agency will ensure, so far as possible, that its policies, decisions and advice take into account sustainable development. The priority for the Agency will be to protect the interests of consumers in relation to food, both now and in the future.”

17. This overarching position statement is further expanded on in the proposed new text on sustainable development for the New Strategic Plan (Annex A).

## **A mechanism**

18. The Agency, along with all Government Departments, needs a mechanism to embed sustainable development considerations into policy making. A number of Government Departments developed the system of Integrated Policy Appraisal (IPA). The Agency has further developed this into a Policy Assessment Framework (PAF), which reflects the five principles of better regulation<sup>2</sup>. The use of PAF has a number of advantages.

- It builds on existing development work and piloting that has been undertaken by several departments, but reflects the Agency's remit.
- The framework consolidates into one system a number of pre-existing policy appraisal requirements and promotes robust policy making.
- The use of PAF fits well with the existing system of Regulatory Impact Assessments (RIAs).

19. The PAF approach begins with a series of questions that covers all aspects of sustainable development – environmental, social and economic. The questions act as a prompt to policy makers so that all potential impacts are considered in a methodical way, including how impacts might affect different groups of consumers.

20. Policy makers within the Agency will need guidance on interpretation of the framework questions so that they can more easily identify the relevance to both the Agency's remit and sustainable development. A draft of this guidance is at

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<sup>2</sup> The five principles are proportionality, accountability, consistency, transparency, targeting.

Annex C. Completion of the PAF framework to identify the likely impacts is only the first step in assessing a policy, project or advice for its sustainability. Once the impacts have been identified, an assessment of costs and benefits is needed. This process will be very similar to existing analyses, although the breadth of issues covered will be inevitably greater than is always the case at present. Sustainability will be one of the factors considered by the Agency in ensuring that its decisions to protect consumers are both proportionate and appropriately precautionary.

21. Annex D gives three worked examples of how application of the Policy Assessment Framework would impact on policy development. It is important to note that these examples are only illustrations of the considerations and process that would be involved. They are not thorough policy analysis. Once the assessment mechanism is agreed the assessments can be worked up in more detail. One important point that the examples highlight is that in undertaking the assessments the Agency will need to seek the advice of those Government Departments with the appropriate expertise and responsibilities where matters fall outside of the Agency's remit.

### **Timetable for incorporation of sustainability considerations**

22. Annex E is the proposed timetable for incorporating sustainable development considerations into the Agency's policy development, decision making and advisory functions. The aim, as was envisaged in the draft Strategic Plan, is to have a mechanism for assessing sustainability in place by 2005. The timetable includes a public consultation, focussing on the proposed Policy Assessment Framework and the guidance that is still under development, followed by a series of pilots involving live policy issues or projects.

23. In developing its approach the Agency has sought advice from a number of bodies (including the Agency's Consumer Committee, the Sustainable Development Commission, the Environment Agency and Defra's Sustainable Development Unit) and individual experts. This has enabled the Agency to take account of developmental work and to build on examples of good practice. This consultative process will continue.

### **Impacts**

24. Taking sustainability into account in developing policies, decisions and advice will require additional resources, both in the ongoing application of the PAF and in

terms of initial training and awareness raising requirements. Although policy makers will already be considering many of the issues covered by the PAF, sustainability assessments will take longer. Within the constraints of fixed overall resources this means that average timescales for developing proposals will be increased. It is important to note that the urgency of any action needed to protect public health or other priorities will be a key issue in deciding to what extent the PAF should be used. In some cases it will be necessary to act without prior assessment.

25. The likely additional resource demands need to be judged against the benefits that taking account of sustainable development would bring for consumers, both now and in the future. The PAF also has the advantage of ensuring that policies and projects are subject to a comprehensive appraisal, which irrespective of sustainability issues, is part of robust decision making. It is proposed that as part of the mid-term review of the Strategic Plan in 2007 the Agency should review the implications of the proposed new approach in the light of experience.

### **Action**

26. The Board is asked to:

- **agree** the characterisation of sustainable development as it relates to the Agency (paragraphs 3 - 5);
- **agree** the overarching position statement on sustainable development and the chapter for incorporation into the Strategic Plan for 2005 – 2010 (paragraph 16 and Annex A);
- **approve** the proposed mechanism by which sustainable development will be embedded into the Agency's work (paragraphs 18 - 21 and Annex C);
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**PROPOSED NEW STRATEGIC PLAN TEXT ON SUSTAINABLE DEVELOPMENT  
WORKING SUSTAINABLY<sup>3</sup>**

**Position Statement**

“The Food Standards Agency will seek to run its business in a sustainable manner. The Agency will ensure, so far as possible, that its policies, decisions and advice take into account sustainable development. The priority for the Agency will be to protect the interests of consumers in relation to food, both now and in the future.”

We will contribute to the Government wide policy by taking sustainable development into account in the full range of our policy and decision making, and in advising consumers.

Our work to embed sustainable development will be on two fronts,

- running our business sustainably
- taking forward our remit in a sustainable manner

In doing so we will take into account the four pillars of sustainable development,

- environmental protection
- social progress
- prudent use of natural resources
- economic growth and employment.

Our prime concern will remain to protect the interests of consumers in relation to food, but we will seek to take account of sustainability considerations as well as ensuring that our decisions are both proportionate and appropriately precautionary.

**The Government’s Guiding Principles**

When considering our actions we will also continue to contribute to furthering the Government’s 10 guiding principles relevant to sustainable development, to which we already make significant contributions where they are relevant to our functions (see the box).

**Sustainable Development**

<sup>3</sup> This text will be a section of the “How we will do it” chapter.

<b>Government's 10 Guiding Principles</b>	<b>FSA Policy</b>
Putting people at the centre	Our No.1 core value is to put consumers first
Taking a long term perspective	In assessing the sustainability of our policies, decisions and advice we will seek to take a long term view
Taking account of costs and benefits	We manage food risks proportionately by balancing risks and benefits
Combating poverty and social exclusion	We give priority to initiatives which help disadvantaged and vulnerable consumers
The precautionary principle	We adopt a precautionary approach through action to protect and inform consumers
Using scientific knowledge	We take an impartial view based on the best available scientific evidence and advice
Transparency, information, participation and access to justice	We listen and develop our food policies openly and transparently; are honest with consumers and do our best to explain our decisions and advice in clear non-technical language
Creating an open and supportive economic system	We aim to be an effective regulator and act proportionately
Respecting environmental limits	By embedding sustainable development we will assess the environmental and resource implications of the way we do things and our policies
Making the polluter pay	We will liaise with appropriate regulators when this is an issue

**These targets and milestones will help people to assess our progress:**

**Estates management:**

- we will implement an Environmental Management System based on ISO 14001 by 2006

**The Agency as an employer:**

- there will be a mid-term external liP assessment in late 2005

- an external benchmarking of our Human Resources Strategy will be completed by May 2005

**Policy development, decision making and advice:**

- we will complete a public consultation on the proposed mechanism to assess the sustainability implications of policy and other proposals by February 2005
- we will pilot the assessment mechanism by Autumn 2005
- we will begin to roll out the mechanism within the Agency by December 2005

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**Update on progress in relation to the Agency as an employer**

(Not for inclusion in the New Strategic Plan)

There will be a continuous assessment process to ensure that the Agency continues to develop its performance and keeps its liP accreditation and there will be an external, mid term liP assessment in late 2005.

The Agency has an outline human resources (HR) strategy which is now being further developed to support the delivery of the new strategic plan.

Work is already underway with CIPD (the Chartered Institute of Personnel and Development) and CMPS (the training and development arm of Cabinet Office) to externally benchmark our HR Strategy to ensure it is consistent with the social aspects of sustainable development and is scheduled for completion by May 2005.

## RESULTS OF THE PUBLIC CONSULTATION ON THE FSA'S NEW STRATEGIC PLAN IN RELATION TO SUSTAINABLE DEVELOPMENT

Key to organisations where acronyms used:

BCVA – British Cattle Veterinary Association  
 BFFF – British Frozen Food Federation  
 BNF – British Nutrition Foundation  
 BRC – British Retail Consortium  
 CIEH – Chartered Institute of Environmental Health  
 CFA – Chilled Food Association  
 Defra – Department of Environment, Food and Rural Affairs  
 EA – Environment Agency  
 FDF – Food and Drink Federation  
 GCCNI – General Consumer Council NI  
 IDFA – Infant & Diet Foods Association  
 MRC – Medical Research Council  
 NCT – National Childbirth Trust  
 NCW – National Council of Women  
 NFU – National Farmers Union  
 NFWI – National Federation of Women's Institutes  
 NIMEA – Northern Ireland Meat Exporters Association  
 RSPB – Royal Society for the Protection of Birds  
 SCC – Scottish Consumer Council  
 SCIEH - Scottish Centre for Infection and Environmental Health  
 SEPA – Scottish Environmental Protection Agency  
 SWACMA – Snack, Nut and Crisp Manufacturers Association Ltd  
 WCC – Welsh Consumer Committee

Comment	Organisation
Respondents indicated broad support for embedding sustainable development into all FSA's policies.	Defra, EA, WCC, SCC, GCCNI, CIEH, Foodaware, Somerfield Stores Ltd, NCT, RSPB
The recent UK Sustainable Development Strategy consultation document, "Taking it on" may help the FSA to focus their position on sustainability. On a specific point related to taking a long-term perspective, SEPA has been working on a "Long View" project developing scenarios of the future, and the FSA may be interested in the work that we are carrying out.	Scottish Executive, SCIEH SEPA
Integration of sustainable development within central government should be improved. This is a key finding from CIEH survey of LAs to identify capacity of local government to deliver sustainable development. Survey results available to FSA on request.	CIEH
For the FSA to ensure sustainability requires not only a realistic view of its plans for the future but a commitment to adjust them as issues change and develop. Planning is essential, but changing attitudes, for example on health and nutrition, require the FSA to adjust its programme as it increasingly earns public trust.	IDFA
Sustainable development should be the 3 <sup>rd</sup> priority after food safety and eating for health. Since "embedding sustainability" is unlikely to occur unless it becomes one of the Agency's priorities with its own sets of targets and deadline.	Sustain, NFWI

Sustainability should be the 4 <sup>th</sup> priority area.	Foodaware
Sustainable development issues are vitally important and should not be sidelined or dismissed.	FSA's Consumer Committee
Bernard Matthews does not think this is the role of the FSA, but it is within the remit of Defra to promote this work. Bernard Matthews suggests that the Agency does not take up this banner but remains focused on hygiene and food safety initiatives.	Bernard Matthews
General recommendation is for FSA to look at sustainability in its broadest sense. A number of respondents quote using the Brundtland definition which states that "sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The definition encompasses environmental protection, economic growth and social equity. GCCNI also add to this by saying that consumers should not be faced with a two tier system of sustainable and unsustainable food; neither should there be a price premium for the more ethical of these.	SCC, GCCNI, Sustain, Vegetarian Society
If there had been a definition of "sustainable development" maybe this would have prompted a more specific answer. If FSA are to continue "putting the consumer first" then consultations should be more consumer-friendly and understandable to the ordinary person in the street. The Institute for Sustainable Development defines this as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs." Therefore does sustainable development for the FSA just mean measures to secure the continuation of unlimited Government financial support? NIMEA would support the Institute's definition, as it is inclusive to the needs of all parts of society and not "exclusive" to consumers only. It is therefore suggested that the two main focuses for the FSA in respect of food, should be [a] risk assessment and then practical and sensible management of the associated risk and [b] education in food production and nutrition.	NIMEA
The Royal College of Physicians believes that combatting poverty and social exclusion is very important.	Royal College of Physicians
A strategy on health should consider the widest definition of health as possible. An individual health is affected by many factors and not just lifestyle issues; these include employment, environment, housing and education.	NHS Highland
We would ask that the FSA take account of the differing emphasis in this policy area in different parts of the UK. For instance, in Scotland sustainable development policy emphasises the importance of economic development as well as social and environmental issues. That is especially important when it comes to rural areas. This should be reflected in the FSA policy.	Quality Meat Scotland
An obvious difficulty lies in the number one core value of putting consumers first. If we take this to mean putting today's consumers first it may well be the case that actions for sustainable development in the long-term may require that today's consumers' interests need to be subdued in order that future generations of consumers will a) exist and b) benefit. The statement does not, explicitly, mention the FSA's perspective on environmental matters that relate to the food chains. It probably should.	SAC
FSA's position on sustainability should reflect its primary objective of protecting consumers linked to the need to ensure that they continue to have available a wide range of safe, wholesome and high quality products at a price they are prepared to pay.	FDF, CFA, Federation of Bakers, SNACMA
The Agency should define what it regards as sustainable development. Suggests the Agency would be best served by a relatively well focussed policy on sustainable development concentrating on the food chain and focussing less on global concerns and social policy.	Roger Jones
The Agency must recognise the contribution the food retail sector makes to: Maintaining high and stable levels of economic growth and employment; Social progress which recognises the needs of everyone;	BRC

<p>Effective protection of the environment; and Prudent use of resources. Agency policy making must be guided to meet these four core objectives.</p>	
<p>While not claiming this is in any way definitive, the FSA's "guiding principles" of sustainable development listed on page 27 of the draft plan bear almost no resemblance to the principles of sustainable development widely understood elsewhere in government or, indeed, in society as a whole. As well as recommending sustainable development a priority area, Sustain's interpretation of sustainable development, as it applies to food and farming policy, is set out fully in their response.</p>	Sustain, NFWI
<p>The Government lists 10 guiding principles. Only 8 are considered here. Missing 2 are "respecting environmental limits" and "making the polluter pay". The basis of sustainable development is that the "3 pillars" (social, economic and environmental) need to be tackled in an integrated manner if real progress is to be made. The proposed approach appears to be ignoring the environmental aspect of sustainable development. If the FSA is content to endorse, or fails to signal, that a particular food product is being produced in an unsustainable way i.e. environmental limits are not being respected or that the producer is not paying for the pollution, can this be a credible sustainability strategy?</p>	E3 Consulting
<p>Although the term 'sustainable' is often these days linked with agriculture, its wider application needs to be taken into account, as has been done in the list provided on page 27; for example, the extent to which the use of public money can be demonstrated to have had sustainable effects on health. For this reason, it is essential that FSA builds into its programme benchmarking activities which can be used to assess change as a result of this and future strategic plans.</p>	BNF
<p>One of the principles that the FSA does not mention is "creating an open and supportive economic system" and we believe that FSA has an important role to play here by, in Defra's words, being an "effective regulator, assessing costs and benefits, and streamlining regulatory burdens".</p>	NFU
<p>The Agency's guiding principles presented in the draft Strategic Plan should be expanded to include specific reference to the environment and built upon to provide the FSA with a sustainable development action plan that includes action points and targets. This plan includes a pledge to make environmentally friendly eating an easier option and encourage consumers to choose environmentally friendly food products.</p>	RSPB
<p>"Sustainability" is a fashionable concept but one which is difficult to define. The examples provided in the Draft Strategic Plan adopt a sensible, balanced approach to food risks and benefits.</p>	Rothamsted Research
<p>The Committee is very supportive of the principles of sustainability and believes that the FSA is a good organisation to take them forward. The Committee questioned, however, how the plan was compatible with these principles and felt that the implementation of them was far from clear. The Committee highlighted that the Agency needs to develop clear sustainability policies with respect to the food chain and take this work forward.</p>	Scottish Food Advisory Committee
<p>There are many "non sustainable" issues relating to the direction in which the food industry is currently going e.g. food miles, While agreeing that many of these issues are out with the control of the Agency to prevent, it may be that the Agency could be involved in the promotion of sustainable foods e.g. clearer labelling in order to allow for more informed consumer choice.</p>	Stirling Council
<p>Sustainability and the production of local food policies go hand in hand and the FSA should play a pivotal role in the development of these policies, for the meat industry the FSA should encourage a reversal of the trend to close small abattoirs which will help develop local economies and reduce food miles while encouraging organic food. The policies of MAFF which were followed slavishly for several generations to centralise the slaughter industry have been shown to be deeply flawed - just how flawed can be seen by looking at Germany where in one Landau there are still 1600 small abattoirs in operation - this is purely because they choose to maintain their own system under the terms of subsidiarity rather than centralise, the reinstatement of the small abattoirs in the UK should be a clear target for the FSA.</p>	Association of Meat Inspectors GB Ltd

Sustainability should be embedded in all FSA activities from high level policies to the management of the FSA estates. All FSA policy should be subject to an integrated appraisal. Access to environmental science should compliment access to economic and social expertise. Urges FSA to actively participate in the Sustainable Organic Resources Partnership (SORP) for sustainability in agriculture. Urges FSA to cater for consumers who may wish to make choice on the environmental impact or the sustainability of a product.	EA
Many consumers are looking to purchase wildlife and environmentally friendly food products. The Agency should make environmentally friendly eating an easier option and encourage consumers to choose environmentally friendly food products.	RSPB
With regard to sustainability, we are aware that the FSA does not have a direct role in the area of agricultural practice. However, we suggest that there is a need to ensure that practices such as recycling of waste to agricultural land do not pose significant risk to consumers through contamination of food crops.	The Scotch Whisky Association
It is important that we don't infer that sustainable development means organic	Somerfield Stores Ltd
There must be a sustainable UK agriculture industry if the UK is to continue to have a degree of food production self-sufficiency.	BCVA
Farming and many production methods are, it is agreed, outside the remit of the FSA unless food safety is in question. However, published analysis of crops produced by different methods with comparison of mineral and vitamin content would enable shoppers to decide on what is best value to them.	NCW
In terms of food production, the FSA can and should have influence. For a start the FSA needs to re-consider the use of certain food additives, like artificial colourings, Aspartame, MSG and certain preservatives. There are problems in terms of health with these additives.	Hyperactive children's support group
Proposes that FSA in conjunction with EFSA, DEFRA , PSD, EU & world equivalents of UK bodies and industry, as a whole, work on long term sustainability of agricultural production.	Paul Ward
Consumers are becoming increasingly more interested in where food comes from, how it is produced and how it affects us both from an environmental and health perspective. There are potentially short and long term benefits from developing and supporting local food. These include for example fresher foods (fewer road miles), employment and skill development opportunities. The Scottish Consumer Council outlines the issues around food and sustainable development in the paper 'Feeding the Interest' February 2004. The changes in dietary intake required for health improvement will need supported by an appropriate food supply in terms of availability, affordability and accessibility. This has implications for primary food production, food processing and delivery.	NHS Health Scotland
On sustainable development, it is important that the Agency continues to refine the ways in which risks and benefits can be explained in a sensibly balanced way, to help consumers decide. It is likely that this will become increasingly wide ranging. Thus, the recent debate on the relative (and well established) benefits of consuming oily fish as part of a balanced diet, compared to the (theoretical) risk of temporarily exceeding an TDI for contaminants on occasions, is a relatively simple trade off. Others may be more complex. It is likely that the number of such questions will increase in the coming years. It is also likely that consumers will increasingly look to the Agency for scientifically sound, authoritative and robust advice.	Dr G H Pigott
Some sustainable development issues fall out of the remit of the FSA such as food production and transportation. However, sustainable development principles should not be departmentalised, the need for joint working across different policy areas (such as health, education, agriculture, economic development, the environment and sports/culture) is paramount. In responding to a changing world, the FSA should pursue sustainable development as a more prominent priority. A full list of our recommendations to both UK and Welsh Assembly Governments can be found in our recent report "High Price to Pay: consumer attitudes to sustainable consumption in Wales", WCC, May 2004.	WCC
Friends of the Earth believe that good public health is linked directly to sustainable	Friends of

development – the two cannot be separated. We welcome the proposals for integrated working across the UK and internationally. We urge the FSA to be proactive in making links to other government departments, the regions, local authorities, research institutions and the private sector to ensure that there is the maximum integration of food safety policies with agriculture, education, transport, planning, retail provision, social policies and the many other policy areas which go to form the sustainable development agenda.	the Earth
Joined up thinking across Government on sustainability.	Co-op Group, Assured Foods Standards, Heinz, Greggs plc
It is inevitable that as a government department the Agency will be required to contribute to the government's overall position on sustainability. However, BFFF would suggest that the position of the food industry with regard to sustainability is properly and adequately taken care of by ongoing work with Defra, and in particular through FISS.	BFFF
The world food market is rapidly changing and it is important that from an UK consumer perspective that the UK's major players are involved in helping to achieve the Agency's strategy. Forward trends are important and it is essential that "involvement" is not seen as a static. New and additional trade organisations, companies, NGO's and industry bodies should be included at the appropriate stage.	ADAS
We recommend that careful consideration should be given to the balance between research aimed at short-term policy imperatives and investment in longer-term strategic priorities. We particularly endorse the sustainability principle to 'combat poverty and social exclusion'. For example, priority should be given to address the greater risk of obesity among low-income groups, elderly people and some ethnic population sub-groups.	Human Nutrition Research (MRC)
Investing in new industries to promote hygiene in food production seems a good idea. Educational strategies, advertising and pilot schemes also appear to have a rightful place here in helping demand meet with supply in an intelligent fashion.	British Federation Women Graduates
The Board needs to define what is meant by sustainability. Should it be applied to the food production systems and their continuity; self-sufficiency of UK agriculture; organic or non-organic systems of farming; continuation of the food processing industries etc. Equally, should the term be applied to the FSA as an organisation and encompass environmental issues such as decreasing the amount of travel, waste generation, energy use etc.	Mater Hospital Belfast
Suggests that the organisation of local workshops/crunch sessions could well be a route through which people can feel involved and worthwhile opinions become available.	Peel Holroyd & Associates

## DRAFT GUIDANCE ON INTERPRETATION OF THE AGENCY'S POLICY APPRAISAL FRAMEWORK (PAF)

The Framework questions in **bold** are those more likely to be relevant to activities undertaken by the FSA.

Subject area	Framework questions	Guidance
Economic: Public accounts and public service	<ul style="list-style-type: none"> <li>• <b>Will the policy or project involve cost to exchequer funds?</b></li> <li>• <b>Will it result in receipts or savings to the Exchequer?</b></li> <li>• <b>Will it impose administrative or other burdens on public service providers, eg frontline staff in health, education, local government or criminal justice?</b></li> <li>• <b>Will it have any organisational impacts?</b></li> </ul>	<p>In early stages it is unlikely that costs or receipts can be estimated, but note any that may fall to the public sector - FSA or others, especially Local Authorities or other enforcement providers – including:</p> <ul style="list-style-type: none"> <li>• Provision of capital assets, eg buildings, IT equipment</li> <li>• Operating costs, including enforcement costs</li> <li>• Administration costs</li> <li>• Publication / publicity costs</li> <li>• Revenues from sales of assets</li> <li>• Cost savings</li> <li>• Fees / other receipts</li> </ul> <p>It would be rare for a FSA project or policy not to have some impact in this area, although it may be minor (eg accommodated within existing resources). The focus should be to identify where costs are likely to be <i>significant</i>. Remember that RIAs now require a public sector threshold test. Indicate here if the threshold is likely to be exceeded.</p> <p>As well as considering any monetary costs, also consider whether the policy might affect how the Agency might be perceived in terms of credibility, trust, standing with the public and any other organisational issues.</p> <p><u>Further information:</u> FSA's economic advisors <i>[Link to Public Sector Threshold Test in RIA guidance]</i> <i>[Link to Treasury Green Book]</i></p>
Economic: Consumers	<ul style="list-style-type: none"> <li>• <b>Will the policy or project affect the cost, quality or availability of commercially available or publicly provided goods of services?</b></li> <li>• <b>Will it result in a change in the choice available to consumers, or the availability of information to enable them to exercise choice?</b></li> <li>• Will it introduce a new technology or process that will make existing goods redundant over time?</li> </ul>	<p>Clearly FSA's policies and projects are highly likely to have positive impacts in this area. Note these, but also take care to note any potential negative effects that may be associated.</p> <p>Impacts may be directly as a result of FSA action (eg provision of information to aid choice) or indirect, unintended consequences, (eg improvements in safety may have implications for price, or a reduction in choice).</p> <p>Think broadly. This is not just about food consumption, or consumption of other goods. Include consideration of people using services – for instance people seeking advice from FSA.</p> <p>Some consumers may be affected more than others. This will be recorded in the section on distributional effects.</p>

Subject area	Framework questions	Guidance
Economic: Business	<ul style="list-style-type: none"> <li>• <b>Will the policy or project impose or relieve a cost or burden on business, charities or the voluntary sector?</b></li> <li>• <b>Will it result in a change in the investment in people, equipment, infrastructure, or other asset?</b></li> </ul>	<p>This aspect will be familiar to most people as it has formed a key aspect of the RIA process for many years.</p> <p>The Government's objective is to minimise the regulatory burden to business. The aim is that any burdens are proportionate to the benefits. The Food Standards Act requires the Agency to take into account likely costs and benefits.</p> <p>At this stage it is not necessary to give actual numbers, but do try to estimate the significance in broad terms.</p> <p>Consider the types of business, charities and voluntary sectors involved, including special consideration of effects on small businesses.</p> <p>Include consideration of:</p> <ul style="list-style-type: none"> <li>• Competitiveness (ie long-term potential for continued growth, including through training, investment and new technologies)</li> <li>• E-commerce (ie do the policies affect businesses that operate via the Internet?)</li> <li>• Burdens (such as time to understand new requirements, training, introduction of new procedures or processes, equipment purchase, inspection costs, licence fees, increases / decreases in labour costs etc)</li> </ul> <p><u>Further Information:</u> FSA's economic advisors For detailed guidance on these aspects see the guidance on RIAs. <a href="#">[Link to RIA guidance]</a></p>
Social: Public health and safety	<ul style="list-style-type: none"> <li>• <b>Will the policy or project enhance or harm health or safety?</b></li> <li>• <b>Will it affect health related behaviour such as diet, physical activity, alcohol, tobacco and drug consumption?</b></li> <li>• <b>Will it affect access to NHS services?</b></li> <li>• Will it affect the use of the work environment to maintain or improve health, or the ability of people to return to work from illness (whether the illness is work related or not)?</li> </ul>	<p>Much FSA work is specifically aimed at improving public health or safety, so it is likely that positive impacts would be expected. There will not only be direct effects on peoples' health (eg dietary improvement, removal of harmful substances or micro-organisms from the diet) but there will also be indirect effects, for instance effects that, say, reduce burdens on the NHS, reduce work time lost due to illness etc.</p> <p>Think also about potential negative effects. For instance may a proposed policy lead to increased risk to workers because of the need for new working practices? (Eg the need for new cutting practices in meat plants as part of BSE controls.)</p> <p><u>Further Information</u> FSA's economists can advise. Health Impact Assessment (HIA) is one of the policy appraisal aspects that is already required by Government. Information on HIA can be found on the Health Development Agency's website at <a href="#">[link to HIA guidance]</a>. The HDA also has an evidence based database that allows you to search related research <a href="#">[link to database]</a>.</p>
Social: Crime	<ul style="list-style-type: none"> <li>• <b>Will the policy or project affect the rate of violent and non-violent crimes?</b></li> <li>• <b>Will it divert people away from or prevent crime?</b></li> <li>• <b>Will it affect people's fears about being victim of crime?</b></li> <li>• <b>Will it create a new offence or create an opportunity for crime eg through fraud?</b></li> <li>• <b>Does the policy create new investigative powers that could increase the risk of violence against public sector workers?</b></li> </ul>	<p>Crime is one of the Government's top four public service priorities. All Departments' work can have a significant impact on crime.</p> <p>The Agency's own work can have positive impacts in several areas, including:</p> <ul style="list-style-type: none"> <li>• Prevention of meat fraud</li> <li>• Import control work</li> <li>• Authenticity work</li> <li>• Certain food hazard incidents</li> </ul> <p>Policies can also have unintended negative impacts on crime. For instance, proposals may make some crime more economically attractive. Policies may also create offences (eg smokies). Consider also possible effects on enforcement officers and possible risks of violence they might face in their work. Sentencing policies can also impact on crime and are linked to incentives.</p>

Subject area	Framework questions	Guidance
Social capital, community and education	<ul style="list-style-type: none"> <li>• <b>Will the policy or project affect the number of people involved in voluntary and community activities?</b></li> <li>• <b>Will it affect people's access to information or social networks?</b></li> <li>• Will it affect the availability of affordable homes of suitable quality?</li> <li>• Will it affect the capacity for parents / guardians to provide a stable environment for their children?</li> <li>• <b>Will it affect the level of skills and education, in the workforce, among children, or otherwise?</b></li> <li>• Will it affect access to, and the range of, facilities for the arts, culture, sports and leisure pursuits?</li> </ul>	<p>This is about creating situations where people are enabled to take advantage of opportunities and also about social engagement.</p> <p>A lot of FSA's work is about positively enhancing peoples' access to information. Education and training are also key areas in which the Agency makes positive contributions. Some aspects of our work also affect social networks.</p> <p>Think also about possible negative effects of any proposed policy. For instance will charities preparing food or providing meals be adversely affected?</p> <p>This subject area is a very difficult one to measure impacts in. In fact, many possible impacts will actually have been noted under one of the other categories. For instance, improving information access or skills may have effects on health. In such cases note the impacts under the other criteria and not here.</p>
Environmental: Climate change	<ul style="list-style-type: none"> <li>• <b>Will the policy or project lead to a change in the emissions of any of the six greenhouse gases, for instance by consumption of fossil fuels?</b></li> <li>• <b>Will it affect, or be affected by, vulnerability to the predicted effects of climate change eg flooding?</b></li> </ul>	<p>The 6 greenhouse gases, and common sources are:</p> <ul style="list-style-type: none"> <li>• <u>Carbon dioxide</u> – fuel combustion and energy use in transport, industrial, commercial and domestic sectors</li> <li>• <u>Methane</u> – landfill waste sites, agriculture, coal mining and gas distribution network (leaks)</li> <li>• <u>Nitrous oxide</u> – agriculture, industrial processes, fuel combustion</li> <li>• <u>Hydrofluorocarbons</u> – foams, refrigeration, air conditioning, industrial processes</li> <li>• <u>Perfluorocarbons</u> – industrial processes (mainly aluminium manufacture and electrical insulation)</li> <li>• <u>Sulphur hexafluoride</u> – industrial processes (mainly magnesium smelting and electrical insulation)</li> </ul> <p>FSA policies and projects may have significant, although mostly indirect, impacts on climate change. Ways in which we could affect the production of the 6 greenhouse gases include advice or policies leading to increased food transport ("food miles"), changes in agriculture, changes in refrigeration use, and changes in food packaging (eg affecting aluminium manufacture).</p> <p>In relation to how climate change may affect our policies, things to consider include food safety implications of flooding and conversely food safety implications of water shortages (eg shortage of water of suitable quality for irrigation or processing). Both are likely consequences of global warming in the UK.</p> <p><u>Further Information</u> The UK climate change programme [<a href="#">link</a>] sets out details of policies and measures to reduce greenhouse gas emissions. The website also considers how the UK might adapt to the effects of climate change. [<a href="#">Defra have developed a toolkit for evaluating impacts of climate change – link</a>]</p>

Subject area	Framework questions	Guidance
Environmental: Air quality	<ul style="list-style-type: none"> <li>• Will the policy or project lead to a change in the emissions of air pollutants?</li> <li>• Will it result in greater or fewer numbers of people being affected by existing levels of air pollution?</li> <li>• Will it have a bearing on areas of existing poor air quality?</li> </ul>	<p>The Government's strategy on air quality sets health-based standards for the main air pollutants: nitrogen dioxide, fine particles, sulphur dioxide, carbon monoxide, lead, ozone, benzene, 1,3 butadiene, polycyclic aromatic hydrocarbons. Road transport and industry are the main sources of most of these pollutants.</p> <p>FSA policies may have some mainly indirect impacts due to changes in road transport – either changing the overall amount, or transferring it away from town centres or other polluted areas.</p>
Environmental: Landscape	<ul style="list-style-type: none"> <li>• Will the policy or project involve visually intrusive construction works?</li> <li>• Will it involve demolition or modification of historic buildings?</li> <li>• <b>Will it impact on a location in such a way as to change its sense of place or identity in any other way?</b></li> </ul>	<p>Landscape in this context includes such concepts as townscape, heritage, and other related matters. It includes affects on the character of an area and the way that it is perceived. Social and environmental aspects are included.</p> <p>Agency policies may have indirect effects on agricultural activity (eg nutritional advice leading to shifts in the type of farming practised, for instance from livestock to arable farming).</p>
Environmental: Land use, waste and water	<ul style="list-style-type: none"> <li>• <b>Will the policy or project consume a substantial volume of natural, non-renewable resources, including land?</b></li> <li>• <b>Will it lead to a change in the volume of waste produced or to the way it is processed?</b></li> <li>• Will it affect the efficient use of energy or water?</li> <li>• <b>Will it lead to an increase or decrease in water pollution?</b></li> <li>• <b>Will it increase or decrease water abstraction or otherwise affect the flow, run-off or recharge of water?</b></li> </ul>	<p>A key sustainable development objective is to use natural resources more efficiently. The rate of consumption of resources should not reduce their availability for future generations, and producing more with less means reducing environmental pollution, climate change and the degradation caused by the extraction, use and disposal of natural resources.</p> <p>Agency policies may have indirect impacts in these areas.</p> <p><u>Water</u> Will the policy or project have the potential to increase water pollution, create unsustainable demand for water or drainage, or increase the risk of flooding? Relevant issues might be policies that affect agriculture, especially in relation to diffuse pollution (eg from livestock wastes, run-off containing pesticides and fertiliser), policies affecting the disposal of chemicals by the food industry, policies leading to increased water use or the need for additional waste water treatment.</p> <p><u>Waste and resource productivity</u> The safe management and reduction of waste streams is a key Government policy. Consider if your policy may increase the volume of waste. Also consider possible demands on the natural resource base eg water, energy, packaging materials, increased land use or change in land use.</p> <p>Resource productivity is about using resources efficiently. Practices can include designing out waste, improving the lifecycle performance of the product, adopting design practices that will facilitate recycling.</p>
Environmental: Biodiversity	<ul style="list-style-type: none"> <li>• <b>Will the policy or project involve disturbance or relief of disturbance to habitats or species by change of land use, light or noise?</b></li> <li>• Will it lead to severance, fragmentation, isolation or change in size of habitats?</li> </ul>	<p>Human activities are changing and destroying habitats, natural ecosystems and landscapes. In the UK, loss of biodiversity has been especially affected by loss of habitats due to changes in agricultural practices, water extraction and pollution, urban development, transport infrastructure, and invasive species.</p> <p>Agency policies may have effects on biodiversity, policies that increase demand for natural resources will impact on biodiversity. Policies that affect agricultural practices can also have impacts (both positive and negative).</p> <p><u>Further Information</u> Making Biodiversity Happen Across Government: Green Ministers Biodiversity checklist, the UK Biodiversity Action Plan and other information is at [www.ukbap.org.uk] English Nature can provide advice on the implications for biodiversity of particular policies. [DN: Are there devolved equivalents?]</p>

Subject area	Framework questions	Guidance
Environmental: Noise	<ul style="list-style-type: none"> <li>Will the policy or project lead to increase or decrease in exposure to noise of sensitive buildings such as schools and hospitals?</li> <li>Will it lead to an increase or decrease in the number of people affected by existing noise?</li> <li>Will it lead to a change in standards or use that would increase or decrease the noise generated by products?</li> </ul>	<p>Noise, (ie unwanted sound, including vibration) can cause annoyance, interrupt conversation, disturb sleep and, in extreme conditions, cause physical damage. Noise is divided into 3 categories:</p> <ul style="list-style-type: none"> <li>Neighbour or neighbourhood noise caused by people in or around their homes</li> <li>Ambient – or environmental – noise which is generated by transport and industry</li> <li>Occupational noise experienced in the workplace.</li> </ul> <p>Noise is controlled through a wide range of legislation and guidance.</p> <p>It is relatively unlikely that Agency policies and projects will significantly impact on noise levels.</p>
Cross cutting: Rural areas	<ul style="list-style-type: none"> <li><b>Will the policy have a different impact in rural areas from that elsewhere because of the particular characteristics of those areas?</b></li> </ul>	<p>The Government is committed to ensuring that all of its policies take account of specific rural circumstances and needs. “Rural Proofing” is therefore part of the formal policy making process. You should consider whether your policy or project is likely to have a different impact on rural areas from elsewhere.</p> <p>Rural settlement is more dispersed, service outlets, including information sources, are likely to be fewer and require greater journey lengths (cost &amp; transport availability issues), rural deprivation tends to be scattered and may be masked by adjacent affluence, landscape issues may be more important. Firms tend to be smaller in rural areas (9 out of 10 are micro-businesses). Self-employed and sole trader numbers are also above the national average.</p> <p><u>Further Information</u> Rural Proofing Checklist [<a href="http://www.countryside.gov.uk/">www.countryside.gov.uk/</a> - check exact link] Defra has also produced guidance [<a href="#">link</a>]</p>
Cross cutting: Regions and localities	<ul style="list-style-type: none"> <li><b>Will the policy have a different impact in different regions and localities because of the particular characteristics of those areas?</b></li> </ul>	<p>Policies may create differential impact between regions. These include siting of investment, or where the position of a large employer is affected. In addition, consider if the impact will fall differentially on different localities, eg the most deprived neighbourhoods and communities.</p> <p>Agency policies that affect industries that are relatively specific to certain regions are relevant here. For instance, policies affecting the fishing or shellfish industries.</p> <p><u>Further Information:</u> Regional Development Agencies Devolved administrations</p>
Cross cutting: Legal	<ul style="list-style-type: none"> <li><b>Will the policy require any legislative changes?</b></li> <li><b>Will any existing legislation impose constraints on the policy?</b></li> </ul>	<p>It is important to consider the legal implications of any policy. This includes whether new legislation might be required for implementation or whether a policy might be affected by existing legislation. It will be important to seek early legal advice.</p>
Other	<ul style="list-style-type: none"> <li>Will the policy or project have a significant impact that does not appear to be reflected in any of the categories above?</li> </ul>	<p>Are there any other significant impacts that are not covered by the other criteria? One issue that may arise in specific circumstances is in relation to animal welfare. If relevant consider whether the policy might have positive or negative impacts on this.</p>

The following are in relation to distributional impacts on different groups of consumers.

Group	Framework questions	Guidance
Deprivation and income groups	<ul style="list-style-type: none"> <li><b>Have / will the interests of all income groups been/ be taken into account during development of the policy?</b></li> <li><b>Will the policy have greater impact (negatively or positively) on any particular income group?</b></li> <li><b>How will any differential impact be addressed?</b></li> </ul>	<p>It is important that, where possible, the financial impacts on each group (particularly each income group) are considered as part of the wider appraisal process. Any important distributional effects should be identified.</p> <p>This issue is also related to neighbourhood renewal. The appraisal process should ensure that each new policy proposal will improve, not worsen, life in deprived areas and will narrow rather than widen the gap between the most worst and the best.</p>
Age	<ul style="list-style-type: none"> <li><b>Have/ will the interests of all age groups</b></li> </ul>	<p>Consider whether your policy or project might impact</p>

Group	Framework questions	Guidance
	<p><b>been / be taken into account during the consultation phase?</b></p> <ul style="list-style-type: none"> <li>• <b>Will the policy directly or indirectly have greater impact on any particular age group? If so how will this be addressed?</b></li> </ul>	<p>to a greater or lesser extent on different age groups. When considering age related issues the focus is often on older people or children. But consider whether any other age groups might also be disproportionately affected.</p>
<b>Gender</b>	<ul style="list-style-type: none"> <li>• <b>Have / will the interests of both men and women been / be taken into account during consultation phase?</b></li> <li>• <b>Will the policy directly or indirectly have greater impact on any particular gender?</b></li> <li>• <b>Has the Gender Impact Assessment Tool been used?</b></li> <li>• <b>How will any differential impact be addressed?</b></li> </ul>	<p>Some types of policy, such as family friendly working practices or initiatives related to childcare, have obvious gender impact. Gender impact can also result from the unequal distribution of resources. For instance, women often have less access to a private car and may be more frequent users of public transport. Employment patterns differ between men and women. Women from minority ethnic communities are more likely than men not to speak English, which may present issues for policies that rely on information distribution. [reference to the Gender Impact assessment tool]</p>
<b>Disability</b>	<ul style="list-style-type: none"> <li>• <b>Are you ready to provide consultation material in alternative formats (eg Braille) on demand?</b></li> <li>• <b>Have / will relevant groups, including the Disability Rights Commission, been / be consulted?</b></li> <li>• <b>Will the policy directly or indirectly have greater impact on those with disabilities? If so, can the impact be justified in policy terms or in terms of the law? If not, what can be done to mitigate any disadvantage that might arise in respect of disabled people?</b></li> </ul>	<p>In considering the impact of a policy or project on disabled people, it is important to note that this group is in itself diverse. Wheelchair users are often the first people who spring to mind in this category: but the needs of other physically disabled people, as well as people with sensory impairments, those who have learning disabilities or speech impairments.</p> <p>It is unlikely that impacts will be the same across this group. The interests of people with chronic illnesses should also be considered.</p>
<b>Race and faith</b>	<ul style="list-style-type: none"> <li>• <b>Have / will ethnic minority groups been / be involved in the consultation phase?</b></li> <li>• <b>Will the policy directly or indirectly have greater impact on those from particular racial groups?</b></li> <li>• <b>Can changes be made to ensure that the policy reflects the requirements of the Race Relations (Amendment) Act 2000, ie to promote racial equality?</b></li> <li>• <b>If there is a differential impact on particular ethnic groups what can be done to address this?</b></li> </ul>	<p>The Race Relations (Amendment) Act 2000 places a general duty on public authorities to promote racial equality. It is therefore particularly important that impacts on all racial groups are taken into account in policy appraisal. In doing this, it should be recognised that the diversity of minority ethnic communities is very great, going far beyond the traditionally cited Afro-Caribbean and Asian groups; and that substantial differences exist between minority ethnic groups.</p> <p>Faith issues may be related to race issues but may also be independent of them.</p>

## **WORKED EXAMPLES TO ILLUSTRATE HOW APPLICATION OF THE PROPOSED POLICY ASSESSMENT FRAMEWORK (PAF) CAN INFORM POLICY DEVELOPMENT**

The Agency's remit is to protect consumers and their interests in a proportionate and appropriately precautionary way. The decision making process therefore needs to understand the potential costs and benefits (both quantitative and qualitative) of the proposed action. The impact on sustainability is one of these potential costs or benefits.

These examples highlight that:

- Although the use of the PAF cannot itself indicate if an approach is sustainable, it does help to identify all significant impacts, both positive and negative. From this a judgement can be made about sustainability.
- The assessment process can assist in identifying alternative delivery options.
- The need for the FSA to seek the advice of those Government Departments with the appropriate expertise and responsibilities.
- Where existing policies are assessed using PAF it is found that many of the aspects identified were included in the original consideration.

### **Example 1: Protection of the food chain post Chernobyl**

After the Chernobyl accident in 1986, and initial emergency measures to protect the food chain had been put into place, MAFF had to decide what to do about sheep that had been contaminated with radionuclides in upland areas, including parts of Cumbria, Wales and Scotland. Faced with this situation the PAF could be used to assess the sustainable development implications of different options. Two such options might be:

- To set up a monitoring system, where sheep are allowed to continue grazing, but are monitored (with suitable compensation to the farmer) to ensure that they are below an internationally accepted safety level of radionuclides before they are allowed to enter the food chain. (This is the actual policy.)
- To cull the sheep and prevent further grazing until radioactivity levels in the land have reduced, with suitable compensation to the farmers.

Using the PAF the key considerations would include –

- The level of health protection for consumers.
- The costs of the monitoring scheme and compensation to farmers for delays in sending lambs to market, against the costs of compensation in the event of a cull.

- Impacts on UK lamb availability to consumers.
- Economic effects on sheep farmers and associated businesses.
- The possibility of creating incentives to commit crime.
- The role of sheep grazing in maintaining the landscape and biodiversity of upland areas.
- Impacts on rural communities and economies in discrete geographic areas where there is heavy reliance on farming and tourism.

It is interesting to note that many of these considerations were taken account of in the original policy assessment.

### **Example 2: The Agency's advice on fish consumption**

The Agency's advice is that people should aim to eat at least two portions of fish a week. Girls and women who might have a child in the future, and women who are pregnant or breastfeeding, can have up to two portions of oily fish a week. Other women, men and boys can have up to four. This advice on eating fish is based on scientific evidence of the health benefits of eating fish, the lack of alternative sources of the relevant omega 3 fatty acids and potential risks concerning contaminants. Assessing the sustainability of the advice, however, would require consideration of many other additional factors, as set out in the Policy Assessment Framework (Annex C). These considerations include –

- Whether fish production (both wild and farmed) could sustain the anticipated increase in demand.
- Potential economic effects and how they might impact on current and future consumers, such as changes in the price of fish or their availability.
- Potential impacts on business, including the fishing industry and associated processing and retail businesses.
- Potential regional and local effects.
- The likelihood of an increase in illegal fishing.
- The likelihood of alternative sources of omega 3 fatty acids being developed and the time scale that would be involved.

An important part of decision making would be to consider a range of options. For example, in relation to fish consumption, options might include targeting oily fish consumption to high-risk groups or seeking alternative omega 3 fatty acid sources through technological advances. Once identified, the likely impacts of each option would be assessed so that a judgement about the sustainability of the policy can be made and fed into the decision making process. In the case of fish, this includes consideration of whether the Agency's advice on fish consumption may lead to tomorrow's consumers not being able to eat fish.

### **Example 3: The Staining of unfit poultry meat**

This example is in relation to the staining of unfit poultry meat to prevent it from fraudulently entering the food chain. Options that could be considered include the staining of all unfit poultry meat or, alternatively, to stain just high risk unfit poultry meat. Low risk unfit poultry meat includes that which is not normally used for human consumption, but is used in things such as pet food. The second option (staining just high risk unfit poultry meat) was the option agreed by the Board.

In applying the PAF to these options the following considerations would be likely to be of importance –

- The protection of public health.
- The relative cost to the public purse of monitoring and enforcement.
- Costs on businesses resulting from the staining requirement. This would be both in terms of direct costs (dye, workers etc), but also from the loss of revenue from selling low risk by-products to the pet food industry.
- Costs to consumers in the form of higher prices for poultry meat.
- The impact on the level of crime (ie prevention of fraud).
- Environmental impacts that may result from having to dispose of large amounts of stained low risk meat that would otherwise be used in pet food (if all unfit poultry meat were stained).
- Distributional impacts on low income consumers (due to higher prices) and on consumers who wish to eat some low risk by-products (such as chicken feet).

It is of note that these considerations mirror many of those that were taken into account by the Board when this matter was originally considered.

## ANNEX E

### TIMETABLE FOR THE IMPLEMENTATION OF A MECHANISM TO ASSESS THE SUSTAINABILITY OF POLICIES, DECISIONS AND ADVICE

Activity	Target Date	Progress
Internal cross-Agency working group set up to advise on development of a mechanism, guidance and awareness raising.	May 2004	Achieved
Initial development of mechanism, based on Policy Assessment Framework (PAF), and guidance material prior to use in case studies.	July 2004	Achieved
Internal workshop on case studies to test out the draft IPA guidance	Early August 2004	Achieved
Evaluation of case studies and further development of draft PAF guidance.	September / October 2004	Ongoing
Decision paper to FSA Board.	14 October 2004	
Issue public consultation document on the draft PAF guidance.	November 2004	
End of public consultation and analysis of results. Consequent amendments to PAF guidance.	February 2005	
Pilots on "live" policy issues or projects.	May 2005 – September 2005	
Evaluation of pilots and revision of guidance as necessary. Prepare evaluation plans for roll out phase. Evaluation to include analysis of resource implications.	October 2005	
Report to FSA Board on pilots, plans for roll out within the Agency and evaluation and monitoring plans.	Prior to roll out	
Target for start of roll out within the Agency. Issue guidance and follow up with training. Evaluation and monitoring report after 9 months.	Begin roll out from December 2005	