

EU REGULATION ON OFFICIAL FEED AND FOOD CONTROLS – APPROACH TO APPLICATION IN THE UK

Executive Summary

1. The paper outlines the approach to application of the EU Regulation on official feed and food controls in the UK and the arrangements for stakeholder consultation.
2. The Board is asked to:
 - **note** the approach for applying the EU Regulation on official feed and food controls in the UK.
 - **note** the proposals for co-ordinated stakeholder consultation on the application measures which apply from 1 January 2006.
 - **note** the intention to come back to the Board for discussion on the way forward on application, including the approach to new and optional measures, taking into account consultation responses.

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EU REGULATION ON OFFICIAL FEED AND FOOD CONTROLS - APPROACH TO APPLICATION IN THE UK

Issue

1. To provide the Board with information on the approach to application of, and policy issues arising from, the new EU Regulation on official feed and food enforcement controls in the UK and to outline arrangements for stakeholder consultation.

Strategic aims

2. The aim is to apply the new Regulation by means of a flexible and proportionate approach that does not impose unnecessary burdens on the enforcement authorities carrying out controls or on the businesses that are subject to them. Application in this way is expected to contribute to the FSA's strategic aim of improving the consistency and effectiveness of enforcement throughout the feed and food chains and, consequently, to raise standards of food safety and consumer protection.

Background

3. Regulation 882/2004 on official controls for **feed** and **food** law, and **animal health** and **animal welfare** rules was adopted in April 2004. It sets out the approach that competent authorities of Member States must adopt for official controls, i.e. for monitoring and enforcing compliance of businesses with feed and food law (this includes the new food hygiene legislation but also all other feed and food safety and standards legislation) and with animal health and welfare rules. This includes a framework for financing of inspections and other enforcement controls. It also sets out how the Commission, through its Food and Veterinary Office, will check that the national control systems in Member States comply with the requirements of the Regulation. The provisions apply from 1 January 2006, except those on financing which apply from 1 January 2007.

4. The Regulation has been introduced to address the wide variation in the manner in which Community legislation is currently being enforced in the different Member States. It consolidates and extends requirements set out in existing sector specific legislation thereby removing inconsistencies and filling gaps in the system. The aim is to create a more comprehensive and integrated, risk-based, EU-wide, 'farm to table' approach to official controls. The objective is to improve the consistency and effectiveness of controls across the EU and, as a consequence, raise standards of food safety and consumer protection, and provide a more level playing field for businesses. The Regulation also aims to provide a greater degree of transparency for consumers about enforcement arrangements.

5. Details of the provisions of the Regulation are provided at Annex A. For the most part, the requirements consolidate existing rules for the Member States and their competent authorities. Some elements are new, notably:
 - **Third country imports** - New harmonised rules are introduced for feed and food of non-animal origin (non-POAO). For those considered 'high risk', the requirements will be similar to those that currently apply to animal products. Importers will be required to pre-notify the relevant enforcement authority of the arrival of consignments and will be required to import these via specific designated ports.

 - **New framework for financing** – An outline of the main elements of the framework on financing of inspections and other enforcement controls is included at Annex A.

 - **New standards for feed laboratories** – Laboratories undertaking analysis of feed for official control purposes must comply with specific standards to ensure that they are competent to carry out this task.

 - **Transparency for consumers** - Provisions are introduced to increase the transparency of enforcement arrangements within the Community through publication of information about official controls and their effectiveness.

 - **National control plans and annual reports** - Member States are required to prepare an integrated multi-annual national control plan setting out details of the control structure and control programmes for the feed and food, animal

health and animal welfare sectors. Annual reports on implementation of the national plan must then be submitted to the Commission.

6. In negotiating the Regulation, the UK position (which had collective Ministerial agreement) was to press for arrangements that would provide a flexible, risk-based, proportionate approach to enforcement. With regard to financing of enforcement controls, the aim was to maintain flexibilities provided for in current EU legislation on charging for hygiene inspections on which current UK charging arrangements are based.

Application of the new Regulation in the UK

7. The FSA has overall responsibility for application in respect of official controls for monitoring and enforcing **feed** and **food** law. In practice, certain aspects are being taken forward separately by the Veterinary Medicines Directorate (residue monitoring and medicated feed issues) and by the Pesticide Safety Directorate (residues monitoring and enforcement). Defra, working with the devolved Agriculture Departments, also has overall responsibility for application in the spheres of **animal health** and **animal welfare**. Arrangements are in place for joint working across the Departments with a view to ensuring consistency of approach.
8. Application for feed and food controls is being taken forward in two phases to correspond to the 1 January 2006 and 1 January 2007 application dates. The first phase will be the subject of co-ordinated public consultation during 2005 – see paras 12 to 13. The second phase, relating to financing of enforcement controls, will include a review of current charging arrangements. Given the later application date, the second phase is not dealt with in this paper but the Board will be kept informed as matters progress and issues that require decisions will be brought back to the Board in due course.

Particular issues for Board attention

9. The provisions of the EU Regulation apply directly but as it is general principles that are set down, and not prescriptive rules, there is flexibility in the way in which Member States may give these effect. Given that most of the new provisions consolidate existing requirements, enforcement arrangements in the UK are

generally already consistent with the EU Regulation. These arrangements have been reviewed and some updating is needed in some areas.

New rules

10. As mentioned in paragraph 5, some elements of the Regulation are new and arrangements will need to be put in place to comply with these. Details of these new requirements are given at Annex B, together with proposals for how these should be applied in the UK. Those that may have a particular impact on stakeholders are:

- **New rules for controls of third country imports of 'high risk' non-POAO** – These non-POAO products are to be identified by means of Commission implementing rules but no proposal has yet been issued so it is difficult to estimate the extent of the impact at this stage. Also, when such products are identified, it is possible that mandatory fees for controls will be introduced. These rules may, however, have other cost implications for importers, particularly the requirement to import the products through specific ports only.
- **New standards for feed laboratories** - This may have significant cost implications for UK Agricultural Analysts.
- **Financing of enforcement** - as highlighted in paragraph 8, any issues on this will be brought to the Board in due course.

Optional rules

11. There are also some other provisions in the Regulation that are optional. Annex B includes details of these and proposals on whether or not the UK should make use of these. The most significant is a provision that permits Member States to require importers to pre-notify the control authorities of consignments of third country imports of all non-POAO feed (and not only 'high risk' feed) with controls undertaken at designated ports only. Where such options exist, policy decisions are needed on whether the UK should make use of these.

UK measures to apply 1 January 2006 provisions

12. Proposed application measures include both **legal measures** and **administrative action**. In addition, **guidance** will be needed, particularly for the enforcement authorities. Details of the proposed application package are set out at Annex C.
13. Stakeholder consultation on the application measures and associated Regulatory Impact Assessments (RIAs) is being planned. For practical reasons, it is proposed to undertake a series of co-ordinated consultations focussing on particular aspects of the application package. This includes, for example, a consultation on the proposed legal measures and associated guidance and RIA which is scheduled to begin at the end of March 2005.

Impact

14. Some of the new elements of the Regulation may have an impact on the Agency. Clearly, this includes the provisions on financing of controls and this issue will be brought back to the Board when decisions are needed. The other main area that may have an impact is the preparation of the national control plan and the subsequent annual reports. The Agency must consider, in liaison with other Government Departments and local authorities, how to manage the co-ordination and production of plans and reports. The Commission is to establish guidelines which will indicate what these should cover but it is not yet clear what these will require. At this stage, therefore, it is difficult to assess the extent of the impact that preparation of these plans and reports may have.

Conclusion

15. The approach being proposed to application seeks to ensure a flexible and proportionate approach to official controls that is compatible with ensuring consumer protection and effective food safety enforcement. Proposals will be refined in the light of formal and informal consultation with stakeholders and brought back to the Board for discussion and agreement.

Board action required

16. The Board is asked to:

- **note** the approach for applying the EU Regulation on official feed and food controls in the UK.
- **note** the proposals for co-ordinated stakeholder consultation on the application measures which apply from 1 January 2006.
- **note** the intention to come back to the Board for discussion on the way forward on application, including the approach to new and optional measures, taking into account consultation responses.

Requirements of EU Regulation 882/2004 on official controls

Introduction

1. Regulation 882/2004 on official controls for feed and food law, and animal health and animal welfare rules was adopted in April 2004. It sets out the approach that competent authorities of Member States must adopt for official controls, i.e. for monitoring and enforcing compliance of businesses with feed and food law (this includes the new food hygiene legislation but also all other feed and food safety and standards legislation) and with animal health and welfare rules. This includes a framework for financing of inspections and other enforcement controls. It also sets out how the Commission, through its Food and Veterinary Office, will check that the national control systems in Member States comply with the requirements of the Regulation. The provisions apply from 1 January 2006, except those on financing which apply from 1 January 2007.

Aims and objectives of the Regulation

2. The objective of the Regulation is to create a more comprehensive and integrated, risk-based, EU-wide, 'farm to table' approach to official controls. The aim is to improve the consistency and effectiveness of controls across the Community and consequently to raise standards of food safety and consumer protection and to facilitate the functioning of the internal market. The Regulation also aims to provide a greater degree of transparency for consumers about enforcement arrangements.

Scope of the Regulation

3. The Regulation sets down the general principles and approach that the enforcement authorities should take. It takes a 'farm to table' approach and covers controls at all stages of production, processing and distribution. It relates to products produced within the EU and those exported to or imported from third countries. Existing specific rules for controls for particular areas of concern, e.g. BSE, will continue to apply without prejudice to the new overarching Regulation.

Competent authorities in the UK

4. In the UK, responsibility for official feed and food controls is held centrally. In practice, execution of the responsibilities is divided between centralised and decentralised authorities. The central authorities include the FSA and Defra and the devolved Agriculture Departments and their agencies (e.g. the Meat Hygiene Service, the Veterinary Medicines Directorate, the Pesticides safety Directorate, the Dairy Hygiene Inspectorate and the Eggs Marketing Inspectorate). At the local level, much of the enforcement of feed and food law is carried out by Environmental Health and Trading Standards Services in the 468 UK local authorities/NI district councils (in NI, this is for food law only as feed law is enforced by DARD). Local authorities at sea and air ports are responsible for checking food imports at borders. In addition, there are 35 authorised Border Inspection Posts (BIPs) with responsibility for controls on products of animal origin entering the UK from third countries.
5. The requirements of Regulation 882/2004 will apply, to a greater or lesser extent, to all these authorities.

General requirements for competent authorities

6. The Regulation sets down the principles that competent authorities should follow in undertaking official controls. These include:
 - adopting a risk-based approach;
 - complying with certain operational criteria e.g. having a sufficient number of suitably qualified and experienced staff, having appropriate legal powers, ensuring that staff are free from conflict of interest; having and using documented control procedures;
 - carrying out internal audit or having external audits undertaken;
 - having contingency plans in place to deal with emergencies;
 - ensuring that recognised methods of analysis are used and that laboratories meet certain standards;
 - taking action where businesses are infringing legal requirements; and,
 - being transparent by publishing information on control activities and their effectiveness.

Third country imports

7. The Regulation covers official controls of third country imports of feed and food. For products of animal origin (POAO), the existing regime is being retained and checks will be carried out at Border Inspection Posts as now.
8. New harmonised rules are introduced for feed and food of non-animal origin (non-POAO), and for those considered 'high risk', the new requirements will be similar to those for animal products. This means that importers will have to pre-notify Port Health Authorities/Local Authorities (District Councils in Northern Ireland) that consignments are expected and they will have to route these consignments through specific ports that have been designated for that purpose. The 'high risk' products will be identified through Commission implementing rules. No proposals have yet been issued by the Commission but these are likely to include such products as peanuts from areas where levels of aflatoxin contamination are known to be high. Member States also have the option of requiring pre-notification and designated ports for controls of third country imports of other non-POAO feed ('low risk').

Financing of inspections and other enforcement activity

9. The Regulation sets out a framework for financing of official controls. The main elements of the framework are as follows:
 - Mandatory fees for veterinary checks on products of animal origin, including import controls, where this is already required under existing EU legislation, e.g. meat and fish hygiene inspections. Flat rate minimum fees are specified. These rates will be updated every two years to take account of inflationary increases in the costs incurred by the enforcement authorities. In the case of intra-Community checks, transitional arrangements are included such that minimum charges under the current legislation may be applied until 1 January 2008. Notwithstanding the flat rate minimum fees, Member States may recover up to and including full costs or may reduce fees below the minimum rates where actual costs are less.
 - Mandatory fees for approvals of feed establishments.
 - In other sectors, Member States have flexibility to impose fees if they wish.

- Where fees are imposed (either mandatory or optional), Member States must take account of a number of factors including the interests of small businesses.
- Member States must recover from businesses the costs for 'excess' controls required following detection of non-compliance. This will apply only in the case of significant issues which are not foreseen in national control plans (e.g. major dioxin incidents). Implementing rules will be established to clarify this but no proposals have yet been issued by the Commission.
- Fees *may* be established for import controls on 'high risk' non-POAO, including 'high risk' non-POAO feed, when such products are identified through the EU comitology procedure and when the specific checks that must be undertaken are laid down. If not, Member States may still charge if they so wish.
- The Commission will review the charging arrangements within three years of the proposal coming into force with a view to extending the range of sectors subject to mandatory fees.

National control plans and annual reports

10. Under the Regulation, each Member State will be required to prepare a multi-annual national control plan setting out the national control structure and the work that the enforcement authorities will undertake. A single integrated plan, covering official feed and food controls and animal health and welfare controls (and also plant health controls), must be produced. Member States will also be required to report annually on implementation of the plan. The plans and reports will be audited by the Commission Inspection Services (the Food and Veterinary Office) and used to assess the performance of national control systems. Similar arrangements will apply to third countries exporting to the Community.

NEW AND OPTIONAL PROVISIONS IN OFFC

ANNEX B

The elements of Regulation 882/2004 that are new and/or optional at Community level for official feed and food controls are listed in the table below.

<u>OFFC requirement</u>	<u>Proposals for applying in the UK</u>
<p>Auditing of competent authorities (new at EU level)</p> <p>Competent authorities are required to undertake internal audits or have external audits carried out to ensure that they are achieving the objectives of the Regulation (consistent and effective enforcement).</p> <p>The Commission is to develop Guidelines which will include criteria for audit. Proposals for the Guidelines have not yet been issued.</p>	<p>Although new at Community level, audit arrangements are already in place in the UK. Arrangements are being reviewed to ensure that they are consistent with the requirements of the new Regulation and some updating will be needed. The review will take account of the Commission Guidelines when these become available.</p> <p>It is also proposed that the FSA's powers under the Food Standards Act 1999 to monitor enforcement activity (including audit) will be revised to ensure that they extend to the responsibilities of competent authorities under the OFFC Regulation.</p> <p>VMD (residues and medicated feed) and PSD (residues) are also reviewing arrangements for audit in respect of the work that they carry out.</p>
<p>Requirements for 'control bodies' (new at EU level)</p> <p>Competent authorities may delegate certain control tasks to independent bodies (in the UK, this is mostly commercial Public Analyst laboratories). Such bodies will be required to meet certain specified criteria and standards and must be audited or inspected.</p>	<p>Although the rules are new at Community level, commercial Public Analyst laboratories in the UK already have to meet (be accredited to) appropriate standards and any contracts with them specify certain conditions. They are not currently audited or inspected formally so the FSA proposes to review an existing agreement with the UK Accreditation Service (UKAS) on accreditation of official food laboratories with a view to extending its role to include audit.</p> <p>VMD (residues and medicated feed) and PSD (residues) are also reviewing arrangements they have with 'control bodies'.</p>

<u>OFFC requirement</u>	<u>Proposals for applying in the UK</u>
<p>Standards for official feed laboratories (new at EU level)</p> <p>Official laboratories undertaking analysis of feed will for the first time have to meet (or be accredited to) specific standards.</p> <p>This is in line with current requirements for official food laboratories.</p>	<p>In the UK, food laboratories (Public Analysts) are effectively also feed laboratories (Agricultural Analysts) so this requirement may mean that accreditation will simply have to be extended to cover feed methods. Clearly, however, this will have cost implications for the laboratories involved. There is to be a transition period (the Commission has yet to confirm how long this will be) to apply this requirement. In the meantime, the FSA proposes to work closely with the Association of Public Analysts to consider how to minimise the impact.</p> <p>It is also proposed to extend the existing FSA/UKAS agreement (see above) to include accreditation/audit of feed laboratories.</p>
<p>Import controls for non-POAO feed and food from third countries (new at EU level)</p> <p>Harmonised rules are introduced. For non-POAO generally, random checks at any place in the feed and food distribution chain after importation are required. Consignments of 'high risk' non-POAO (see below) must be pre-notified to Port Health Authorities/Local Authorities (District Councils in Northern Ireland) and checked at designated ports. Increased levels of checks will be specified for these products.</p>	<p>Requirements are directly applicable but domestic legislation is proposed to provide for enforcement and relevant penalties and sanctions. These new legal requirements will supersede existing national measures on imported food.</p>
<p>List of 'high risk' non-POAO feed and food (new at EU level)</p> <p>A list of 'high risk' non-POAO (see above) is to be drawn up at EU level through comitology procedures. The list will be kept under review so that it may be updated when new or emerging risks are identified.</p>	<p>Although the list of 'high risk' non-POAO is due to be in place by 1 January 2006, the Commission has not yet issued any proposals. Once such proposals are available, consultation with stakeholders is proposed so that their views may be taken into account in developing the UK's position for discussions in Brussels.</p>
<p>Imports of non-POAO feed (optional provision)</p> <p>In addition to the above, Member States have the option of requiring prior notification/designated ports for third country imports of all other non-POAO feed (i.e. 'low risk' products).</p>	<p>This option is possible under existing EU legislation but the UK has not taken it up. The Advisory Committee on Animal Feedingstuffs (ACAF) is currently reviewing feed law enforcement. Prior notification of third country feed imports is one of the issues being addressed in the review.</p>

<u>OFFC requirement</u>	<u>Proposals for applying in the UK</u>
<p>Feed and food from other Member States (optional provision)</p> <p>Member States may request businesses to notify them when consignments of particular products from other Member States are received.</p>	<p>As there is no corresponding obligation in the Regulation for businesses to provide the information, it may be going beyond the minimum needed for application to introduce offences and penalties for businesses failing to notify the authorities. In view of this, no domestic legislation is proposed.</p>
<p>Framework for financing of official inspections and other enforcement activity (new at EU level)</p> <p>Details are given at Annex A.</p>	<p>These provisions do not apply until 1 January 2007. The Board will be kept informed and consulted on issues that require decisions as matters progress.</p>
<p>National control plans and annual reports (new at EU level)</p> <p>Member States will be required to submit and annually update a high-level general control plan for the enforcement of feed and food legislation and animal health and welfare rules and to report annually on the implementation of that plan. These control plans will form the basis of Commission controls in Member States.</p>	<p>Guidelines on what these plans and reports must cover are awaited from the Commission. In the meantime, the FSA proposes to liaise with other relevant Government Departments with regard to managing preparation of the co-ordination of the plan and reports and with local authorities in respect of information that they may need to supply.</p> <p>Legal measures are proposed to ensure that the relevant Government departments may share the necessary information and that local authorities provide relevant information on their controls activities under OFFC to the FSA.</p>
<p>Transparency for consumers (new at EU level)</p> <p>Competent authorities must publish information about official controls and their effectiveness.</p>	<p>As the FSA is already constituted as a transparent organisation, no specific action is proposed.</p> <p>With regard to local authorities, there are existing obligations for them relating to transparency in the Food Safety Act 1990 Code of Practice and in the Framework Agreement on Local Authority Food Law Enforcement. It is proposed that the FSA, in close liaison with local authorities, will review these arrangements and update them if necessary.</p>

Outline of package of measures to apply EU Regulation 882/2004 as regards feed and food controls

The package of measures which will be needed to apply Regulation 882/2004 is outlined below. Details of the proposed dates for consultation or, where appropriate, for agreements to be in place, are also specified. For those measures that do not apply UK or GB wide, individual measures will be developed in England, Scotland, Wales and Northern Ireland as indicated below.

Measure	Proposed dates
Legal measures	
<p>Official feed and food control SI (FSA lead)</p> <p><i>Separate SIs are being developed in England, Scotland, Wales and Northern Ireland.</i></p> <p>It is proposed that the SI include general provisions to ensure that the FSA's powers relating to audit and monitoring of enforcement activity are extended to cover responsibilities of enforcement authorities under OFFC. It will also implement the provisions in the new Regulation on official controls of third country imports of non-POAO.</p>	<p>Consultation to begin by end March 05</p> <p>The consultation package will include an associated Partial Regulatory Impact Assessment, general guidance on the Regulation for stakeholders and revised guidance on imported food controls (see below).</p>
<p>Amendment of the Products of Animal Origin (Third Country Import) Regulations (Defra/devolved Agriculture Departments lead)</p> <p>Some minor technical amendments are needed to implement OFFC.</p>	<p>Consultation to begin in April 2005</p>
<p>Amendment of legislation on zootechnical additives and medicated feed (VMD lead)</p> <p><i>UK wide measure</i></p> <p>Legal measures needed to apply OFFC in this area have been incorporated into the draft <i>Veterinary Medicinal Products Regulations 2005</i>.</p>	<p>Consultation began on 4 January 2005</p> <p>The consultation package included a partial RIA covering the scope of the new SI which is much wider than medicated feed and zootechnical additives.</p>
<p>Amendments to pesticides legislation (PSD lead)</p> <p><i>UK wide measure</i></p> <p>Some minor amendments may be needed to implement OFFC.</p>	<p>Provisionally, March 2005</p>

Measure	Proposed dates
Administrative measures	
<p>Code of Practice/Practice Guidance for English local authorities (FSA lead) <i>There will be corresponding updating of Codes/practice guidance applying in Scotland, Wales and Northern Ireland.</i></p> <p>Some updating of the Food Safety Act 1990, Section 40 Code of Practice (and associated Practice Guidance) for local authority food law enforcement is proposed. The Code will also be made under the new OFFC SI (and new hygiene regulations) so that it extends to the responsibilities of local authorities under OFFC (and that it reflects the new food hygiene regulations).</p>	Consultation to begin in April 2005
<p>Code of Practice for Local authority/DARD feed law enforcement (FSA lead) <i>Consideration will be given to developing separate Codes for England, Scotland, Wales and Northern Ireland as drafting progresses..</i></p> <p>A new Code of Practice for feed law enforcement is being prepared following a recommendation to the UK by the Commission's Food and Veterinary Office. It is proposed that this is drafted to reflect the general requirements for local authorities under OFFC.</p>	Consultation to begin in May 2005
<p>Framework Agreement of Local Authority Food Law Enforcement (FSA Lead) UK wide measure</p> <p>Some updating of the Framework Agreement is proposed so that it reflects the revised Food Safety Act Code of Practice and the new Code on feed (see above).</p>	review by the Agency's Enforcement Liaison Group (Framework Agreement Sub-group) to begin in April/May 2005
<p>Border Inspection Post Manual (Defra/DARD in NI lead) UK wide measure</p> <p>This includes enforcement instructions for the authorities responsible for controls on third country imports of POAO. Some updating of the Manual is proposed to ensure that it reflects the general requirements of OFFC.</p>	Consultation to begin in June 2005
<p>Meat Hygiene Service (MHS) Manual for Official Controls (MHS lead) <i>As far as possible this will be the basis for a UK document with changes in NI to reflect services provided by DARD Veterinary Service.</i></p> <p>This is being revised in the light of the new food hygiene legislation. The revision will also take account of the general provisions for enforcement authorities in OFFC.</p>	Consultation to begin in April/May 2005

Measure	Proposed dates
<p>MHS Service Level Agreements (MHS lead)</p> <p><i>GB measure. Similar revisions will be required to the Service Level Agreement between FSA-NI and DARD's Veterinary Service.</i></p> <p>MHS Service Level Agreements with the FSA/Defra and devolved Agriculture Departments are being revised to ensure that they take account of the general requirements for enforcement authorities in OFFC and also the new food hygiene legislation</p>	<p>To be finalised following consultation and in place by 1 January 2006</p>
<p>Dairy Hygiene Inspectorate (DHI) enforcement instructions (FSA lead)</p> <p><i>England and Wales measure. In Scotland - Dairy Hygiene Inspection instructions to Local Authorities are contained in Enforcement Codes of Practice and this will similarly need to be revised. In Northern Ireland, similar instructions will be issued to DARD's Quality Assurance Branch.</i></p> <p>These instructions are being revised in the light of the new food hygiene legislation. The revision will also take account of the general provisions for enforcement authorities in OFFC.</p>	<p>Consultation to begin April 2005</p>
<p>DHI Service Level Agreement with FSA (FSA lead)</p> <p><i>England and Wales measure. Similar revisions will be needed to the Service Level Agreement between FSA-NI and DARD's Quality Assurance Branch.</i></p> <p>This Service Level Agreement is to be revised to ensure that it takes account of the general requirements for enforcement authorities in OFFC and also the new food hygiene legislation.</p>	<p>To be agreed by end March 2005</p>
<p>Egg Marketing Inspectorate (EMI) enforcement instructions (FSA lead)</p> <p><i>England and Wales measure. In Scotland enforcement instructions to SEERAD will similarly need to be revised. In Northern Ireland, instructions to DARD's Quality Assurance Branch will similarly need to be revised.</i></p> <p>These instructions are being revised in the light of the new food hygiene legislation. The revision will also take account of the general provisions for enforcement authorities in OFFC.</p>	<p>[Consultation to begin April 2005]</p>

Measure	Proposed dates
<p>EMI Service Level Agreement with FSA (FSA lead)</p> <p><i>England and Wales measure. In Scotland, The Service Level Agreement between SEERAD Egg & Poultry Unit and FSA will similarly need to be revised. Similar revisions will be needed to the Service Level Agreement between FSA-NI and DARD's Quality Assurance Branch.</i></p> <p>This Service Level Agreement is to be revised to ensure that it takes account of the general requirements for enforcement authorities in OFFC and also the new food hygiene legislation.</p>	<p>To be agreed by end March 2005</p>
<p>FSA agreement with the UK Accreditation Service (FSA lead)</p> <p><i>UK-wide measure.</i></p> <p>It is proposed to revise this and extend the role of UKAS to audit official food laboratories and, in due course, to accredit/audit official feed laboratories.</p>	<p>Consultation on the proposal to extend the role of UKAS for food laboratories will form part of the package to be issued end March 2005. The agreement will subsequently be revised in liaison with UKAS.</p> <p>For feed laboratories, consultation on extending the FSA/UKAS agreement will follow when the Commission has specified the transition period.</p>
<p>General guidance on Regulation 882/2004 (FSA lead)</p> <p><i>UK wide measure.</i></p> <p>It is proposed that general guidance on the Regulation will be developed. This will, principally be aimed at the enforcement authorities but will also available to all stakeholders.</p>	<p>Part of package for end March 2005 consultation</p>
<p>Guidance on imported food controls (FSA lead)</p> <p><i>This will incorporate guidance on the provisions in the new OFFC Sis – see above – so separate Guidance will be prepared for England, Scotland, Wales and Northern Ireland.</i></p> <p>It is proposed that the existing guidance on imported food controls will be revised to reflect the new requirements for import controls in OFFC.</p>	<p>Part of package for end March 2005 consultation</p>