COM/2025/1030 Proposal for a Regulation amending Regulations (EC) No 999/2001, (EC) No 1829/2003, (EC) No 1831/2003, (EC) No 852/2004, (EC) No 853/2004, (EC) No 396/2005, (EC) No 1099/2009, (EC) No 1107/2009, (EU) No 528/2012, (EU) 2017/625 as regards the simplification and strengthening of food and feed safety requirements

Reponses from the Food Standards Agency

1. **How many businesses in Northern Ireland would be expected to benefit from cost savings if the proposed EU act is applied? Please provide details of the anticipated level of savings for businesses and public authorities in Northern Ireland.**

   The European Commission estimates that the total cost saving for businesses across the EU due to the feed additive proposals would be €22.1 million, with a further €5 million in savings for national and EU administrations. There would be proportionate direct and indirect savings for Northern Ireland businesses and public authorities. The majority of Northern Ireland feed production capacity is focused on finished compound feeds. The FSA is not aware of any feed additive producers in Northern Ireland. The FSA is aware of two premixture producers in Northern Ireland, who would be expected to benefit from the changes to labelling requirements which would reduce the amount of text that must be printed and translated, reducing costs and simplifying logistics.

   The European Commission states that the legal clarification on genetically modified micro-organisms (GMMs) would reduce expenditure by businesses and competent authorities linked to unnecessary product withdrawals due to lack of clarity on the legislative position. This clarification reflects the FSA's longstanding understanding on the use of GMMs.

   The European Commission states that each hygiene notification under current requirements induces staff costs of equivalent to three weeks of staff time in the notifying country and the proposals could reduce this by 25% to 50%. Northern Ireland public authorities would benefit from this saving if any notifications were made in the future.

   The European Commission has assessed that the estimated total cost saving for national and EU administrations due to the laboratory accreditation proposals would be €602.2 million. There would be proportionate savings for Northern Ireland public authorities and laboratories.

2. **Are any negative impacts (including to consumer health and safety) foreseen as a result of regulatory/administrative obligations being removed by the proposed EU act? If so, please provide more detail on these.**

   No negative impacts are foreseen. These are procedural changes and technical clarifications, which maintain consumer protection.

3. **Would any elements of the proposed EU act place new regulatory/administrative obligations on businesses or public authorities in Northern Ireland? If so, please provide more detail on the likely impact of those new obligations.**

   The proposals in the FSA's remit do not place any new regulatory or administrative obligations on businesses or public authorities in Northern Ireland.

4. **The FSA's Assessment of Impact states that it has sought initial views from National Reference Laboratories and Northern Ireland-based official laboratories. How many Northern Ireland-based laboratories were engaged with? Please provide further detail on the views expressed by them.**

   The FSA has a network of five EU-based National Reference Laboratories (encompassing 14 specific areas) and two Northern Ireland-based Official Laboratories. Responses were received from all of these laboratories.

   Northern Ireland-based Official Laboratories broadly welcomed the recognition of operational constraints, the need for flexibility, and the aim to reduce administrative burden.

   The proposals would give the European Commission the ability to bring forward legislation setting out future derogations from current laboratory designation requirements in more detail. Therefore, it is difficult for laboratories to determine how much benefit might be gained.

   Based on the information currently available, laboratories welcomed simplified accreditation requirements, particularly to improve responsiveness during emergencies and supply shortages, and to enable testing outside strict accreditation scopes (with appropriate quality controls remaining to ensure validity of results). This could deliver increased testing availability and resilience.

5. **What (if any) plans do relevant departments have to engage with NI-based stakeholders on the proposed EU act as it progresses through the EU legislative system?**

The FSA will continue to engage with stakeholders through our regular engagement with our network of laboratories, our animal feed and meat stakeholder fora, and the Northern Ireland Food Industry Liaison Group.

The FSA will continue to provide updates in the Northern Ireland Food Industry Stakeholder Bulletin, which reaches over 5000 subscribers.

The FSA is also working alongside DAERA and DfE to seek stakeholder views.