

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

- 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.**

There will be limited cost savings for business and public authorities in Northern Ireland (NI), as detailed below.

Regulation (EU) 2017/625 – Officials Controls – Plant Health aspects

Partial clearance of a consignment on a Common Health Entry Document (CHED): The amendments enable the partial release of a consignment on a CHED, rather than retention of a whole load. Around 14000 consignments for plants and plant products are imported to NI each year. Of these a very small number are detained (<0.1%) and the amendment would therefore result in a negligible cost saving. However, the amendment would be positive for any business impacted, reducing the likelihood of loss of produce caused by deterioration of full consignments awaiting laboratory results.

Laboratories: amendments will not have any cost savings for NI businesses; however, they will provide savings for official laboratories such as the Agri-Food and Biosciences Institute (AFBI), which are funded by government.

Regulation (EU) 2017/625 – Officials Controls – Wider Sanitary and Phytosanitary aspects

No business in NI would be expected to benefit from cost savings. Laboratory accreditation costings are borne by both the NI and UK Government (additional requirements and subsequent charges as a result of Windsor Framework for the official laboratory are funded by His Majesty's Treasury).

Regulation (EU) 2017/625 – Officials Controls – Animal Feed

As with the section on plant health aspects above, the amendments permit the partial release of consignments recorded on a CHED, rather than requiring detention of an entire load. Approximately 18 consignments of high-risk feed of non-animal origin are imported annually. Only a small proportion of these consignments are subject to physical and identity checks, which may involve temporary holding of products. As a result, the scope for cost savings is very limited, and the overall financial benefit to businesses and public authorities in NI is expected to be minimal.

Council Regulation (EC) No 1099/2009 regarding Protection of Animals at the Time of Killing

The amendments would not offer any cost-saving advantages for businesses in NI.

Regulation (EC) No 999/2001 regarding laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies

The amendments would not offer any cost-saving advantages for businesses in NI, as the cost of sampling for transmissible spongiform encephalopathies is borne by the Department.

Regulation (EU) 1107/2009 concerning plant protection products

There would be a limited cost saving to PPP manufacturers in NI, as there is only one business with a registered office in NI and associated production operations are carried out in GB. There may be some benefits such as streamlining of bringing biopesticides to market, but DAERA are unable to quantify these savings. Furthermore, it is not possible to quantify the specific cost savings for HSE in relation to NI. Any NI-related savings for HSE would arise from reduced administrative workload rather than any lowering of safety standards, which remain unchanged.

The proposed amendments would offer indirect cost savings for NI PPP users under Regulation 1107/2009 by accelerating access to biocontrol and alternative products and reducing regulatory disruption, thereby avoiding yield losses, emergency derogation costs and compliance uncertainty rather than cutting direct fees or product prices. DAERA do not hold a complete record of all PPP users in NI, but a best estimate is \approx 12,000–14,000 businesses across the agriculture, horticulture, forestry and amenity sectors.

Regulation (EC) 396/2005 concerning pesticide residues

The specific pesticide-related cost savings for NI food and feed businesses and HSE cannot be quantified, as they are expected to arise indirectly through reduced administrative burden, fewer market disruptions and lower levels of food waste.

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.

There will be limited negative impacts in NI (including to consumer health and safety) foreseen as a result of regulatory/administrative obligations being removed by the proposed EU act, as detailed below.

Regulation (EU) 2017/625 – Officials Controls – Plant Health aspects

Partial clearance of a consignment on a Common Health Entry Document (CHED): No anticipated negative effects.

Laboratories: No anticipated negative effects.

Regulation (EU) 2017/625 – Officials Controls – Wider Sanitary and Phytosanitary aspects

No anticipated negative effects.

Regulation (EU) 2017/625 – Officials Controls – Animal Feed

The use of digital labelling (for example, QR codes) for non-safety-critical information on feed additive labels may present traceability challenges, particularly during time-critical incidents (due to issues with printing quality for example).

Council Regulation (EC) No 1099/2009 regarding Protection of Animals at the Time of Killing

No anticipated negative effects.

Regulation (EC) No 999/2001 regarding laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies

No anticipated negative effects (including to consumer health and safety).

Regulation (EU) 1107/2009 concerning plant protection products

No negative impacts are foreseen on safety; the proposal explicitly states that the removal or streamlining of certain regulatory/administrative obligations under Regulation (EC) No 1107/2009 is designed to maintain the same level of protection for human health, animals and the environment. However, some stakeholders may interpret this as a reduction in regulatory oversight and perceive it as posing potential risks to health and safety.

Regulation (EC) 396/2005 concerning pesticide residues

No direct negative impacts on consumer health and safety are anticipated with changes limited to procedural and administrative simplification and improved transitional arrangements. Maximum Residue Levels (MRLs), consumer safety thresholds and exposure assessments remain unchanged at their current high level.

Indirectly, there may be an impact on imports, as implementation of a hazard-based approach may raise international sensitivities and prompt trade-related concerns.

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.

There will be no significant new regulatory/administrative obligations on businesses or public authorities in Northern Ireland, as below.

Regulation (EU) 2017/625 – Officials Controls – Plant Health aspects

Partial clearance of a consignment on a Common Health Entry Document (CHED): No new regulatory or administrative obligations for businesses or public authorities in NI.
Laboratories: No new regulatory or administrative obligations for businesses or public authorities in NI.

Regulation (EU) 2017/625 – Officials Controls – Wider Sanitary and Phytosanitary aspects

No new regulatory or administrative obligations for businesses or public authorities in NI.

Regulation (EU) 2017/625 – Officials Controls – Animal Feed

No new regulatory or administrative obligations for businesses or public authorities in NI.

Council Regulation (EC) No 1099/2009 regarding Protection of Animals at the Time of Killing

No new regulatory or administrative obligations for businesses or public authorities in NI.

Regulation (EC) No 999/2001 regarding laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies

No new regulatory or administrative obligations for businesses or public authorities in NI.

Regulation (EU) 1107/2009 concerning plant protection products

No significant new regulatory or administrative obligations are placed on businesses or public authorities in NI under Regulation (EC) No 1107/2009. COM (2025)1030 is designed primarily to remove or streamline existing obligations. Instead, it introduces limited new procedural features which may create minor, targeted administrative tasks, largely for HSE acting on our behalf rather than businesses. These are intended to support risk-based regulation, not to increase routine burden, although they may have resourcing consequences for HSE due to the change in processes.

Regulation (EC) 396/2005 concerning pesticide residues

No significant new regulatory or administrative obligations are placed on businesses or public authorities in NI under Regulation (EC) 396/2005. Instead, it places greater focus on targeting higher-risk imports, particularly those involving EU-banned active substances or originating from supply chains with weaker pesticide controls. This reflects a shift in enforcement focus rather than an expansion of powers or workload. Any operational impacts on import-reliant businesses are therefore likely to be limited and contingent on how intensively this risk-based enforcement approach is applied.

4. DfE's Assessment of Impact states that there is potential for some short-term divergence between the EU and GB as a result of the proposed EU act. What impact would that have in Northern Ireland?

N/A – question specific to DfE.

5. DAERA's Assessment of Impact states that not applying the proposed EU act in Northern Ireland would negatively impact the cost and availability of plant protection products. How many products would be impacted?

It is not possible to directly quantify cost or availability impacts for plant protection products in NI, as outcomes are influenced by multiple factors, including commercial decisions and future regulatory assessments of active substances and products.

However, not applying the proposed EU would likely have a negative impact on businesses dealing in plant protection products. Persistent EU approval backlogs and lengthy procedures delay the introduction of new pest control tools, an impact that is disproportionately significant for NI given the small scale of its agrochemical market and the relatively high administrative costs for suppliers.

Furthermore, a relatively greater compliance burden may incentivise manufacturers to prioritise larger markets, further reducing product availability in NI.

6. 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.

N/A – question specific to FSA.

7. 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?

Regulation (EU) 2017/625 – Officials Controls – Plant Health aspects

Partial clearance of a consignment on a Common Health Entry Document (CHED):

DAERA Plant Health plan to update stakeholders as the proposal progresses, including via the NI Horticultural Working Group, led by Defra, which includes the Ulster Farmers Union and Horticultural Trade Association.

Laboratories: There are no plans to engage NI stakeholders regarding this amendment as it has no impact on NI businesses.

Regulation (EU) 2017/625 – Officials Controls – Wider Sanitary and Phytosanitary aspects

There are no plans to engage NI stakeholders regarding this amendment as it has no impact on NI businesses.

Regulation (EU) 2017/625 – Officials Controls – Animal Feed

DAERA will keep stakeholders informed as the proposal progresses through the EU legislative process. Engagement will focus particularly on developments relating to

digital labelling, and will include liaison with relevant trade bodies, such as the Northern Ireland Grain Trade Association.

Council Regulation (EC) No 1099/2009 regarding Protection of Animals at the Time of Killing

There are no plans in place to engage with any NI based stakeholders.

Regulation (EC) No 999/2001 regarding laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies

There are no plans in place to engage with any NI based stakeholders on the changes.

Regulation (EU) 1107/2009 concerning plant protection products

DAERA will engage with relevant stakeholders as the full implications of the proposal become clearer; once it is incorporated into the regulatory framework and implementation details are known.

Regulation (EC) 396/2005 concerning pesticide residues

DAERA will engage with relevant stakeholders as the full implications of the proposal become clearer; once it is incorporated into the regulatory framework and implementation details are known.