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Sent: 04 June 2026 15:47

To: DAERA Windsor Framework Business Management Office

Subject: RE: DAERA Return List of Questions - COM/2024/577 - Proposal to strengthen the position of farmers in the food supply chain

Good afternoon

At its meeting on 4 June 2026, the Windsor Framework Democratic Scrutiny Committee (DSC) considered the attached correspondence and agreed to request that the Department of Agriculture, Environment and Rural Affairs (DAERA) takes further steps – including liaising with the Food Standards Agency in Northern Ireland and UK Government as necessary – to ascertain:

- The number of NI businesses likely to be impacted by these provisions;
- The number of locally made products likely to be impacted; and
- The views of any relevant stakeholders identified by the Department (on both the proposal's definition of meat and meat related products and the proposed transition window)

The Committee requests that DAERA includes this information in its assessment of the Regulation once published in the Official Journal of the European Union.

Regards

DSC COM (2024) 577 Revised Assessment of Impact Regarding Proposal for a Regulation amending Regulations (EU) No 1308/2013, (EU) 2021/2115 and (EU) 2021/2116 as regards the strengthening of the position of farmers in the food supply chain

1. How many products produced in Northern Ireland would be impacted by the proposal's definition of meat and meat related products?

DAERA does not collect data on NI food producers producing and selling meat-alternative vegan or vegetarian products, or indeed meat-flavoured products (as they are not agricultural products themselves). We are anecdotally aware of some producers, but it is not clear if there are any products currently being sold that would not comply with the proposals.

2. How many consignments moving into Northern Ireland outside of the Northern Ireland Retail Movement Scheme would be impacted by the proposal's definition of meat and meat related products?

DAERA does not hold data on the volume of goods moving from GB to NI outside of the Northern Ireland Retail Movement Scheme (NIRMS). There is no specific commodity code linked to meat-alternative vegan or vegetarian products (as their composition and ingredients could vary). However, officials would expect that the majority of such products would be moved under NIRMS.

3. What likely costs would relevant producers incur in order to comply with the new definitions?

The proposals for meat related terms may not require labelling changes if products comply (e.g. meat-alternative vegan or vegetarian products). As above, it is not clear to DAERA if any products currently being sold would not comply with the proposals. While DAERA officials are aware of some media reports suggesting the changes would restrict the use of marketing terms for meat-flavoured snacks, it is not yet clear that that is actually the case. The Proposed Regulation remains to be finalised. Furthermore, the provisionally agreed text of the Regulation now includes a new provision in Article 78(3) of the Common Market Organisation (CMO) Regulation empowering the Commission to adopt delegated acts concerning derogations. These would allow the use of meat related terms for other products, whose exact nature is clear due to an established long term use and does not cause any possible confusion to the consumer. Any delegated act could exclude certain products from the scope of this Regulation.

The estimated cost of any labelling changes, if required, are unknown and would likely vary by product or business. Agri-food businesses would update packaging periodically, but the cadence would be determined by specific product or business

need. Any labelling changes, if required to comply with the proposal, could be undertaken during other wider product or labelling refreshment which might remove or lessen any associated cost. Also, the extended implementation period (see response to Q4 below) should help mitigate direct costs and minimise waste. However, we have not engaged any local producers on these proposals, and none have raised this issue with DAERA.

4. DAERA states that relevant producers would have three years before these provisions enter into force. In DAERA's view, is this period of time sufficient for producers to adapt to these changes?

The proposed Regulation states that the application of these provisions should be deferred by three years after the entry into force of this Regulation to allow market operators to adapt and adjust their marketing strategies. Products that have been produced or imported in accordance with the rules applicable before that date will be allowed to continue to be marketed or for a maximum period of three years from that date or until the exhaustion of stocks, whichever occurs first. The implementation period proposed for similar changes regarding meat-related terms in COM (2025) 553 was 12 months.

It is DAERA's understanding that the proposed 3-year implementation period is broadly in line with established practice for the introduction of food labelling changes set out in previous EU law. For example, the Food information to Consumers Regulation EU No. 1169/2011 (FIC) which introduced comprehensive changes to existing EU food law had implementation dates ranging from January 2014 to December 2016. Similarly, in its UK-wide public consultation on fairer food labelling in spring 2024, Defra proposed an 18-month period for the implementation of proposed changes related to improved method of production and country of origin labelling, based on an impact assessment. It is unclear whether the extended implementation period for these meat related terms would provide all producers of non-meat products sufficient time to amend their packaging, if required to comply with the proposals. It would likely vary by product or business, on production throughput, and the date of minimum durability/ 'use by' date of products.

As the proposed amendments relate to amending provisions of the CMO that fall within DAERA's remit, the Department has currently assumed responsibility for these new requirements restricting the use of meat terms but is working closely with the Food Standards Agency in NI which is responsible for general food labelling and the FIC.