Executive Summary

1. The FSA has published a regulatory framework which sets out the factors taken into account when deciding whether, when and how to take any action that has a regulatory impact. Having set this framework, it is timely to consider how to evaluate our performance against this framework and our progress towards being a world class regulator.

2. This paper proposes criteria that, taken together, describe our aspirations as a world class regulator. We have assessed the performance of the organisation against each of the criteria, and have used this assessment to identify those areas where most development is needed. We propose that action planning in these areas is taken forward in parallel with business and resource planning processes for 2008/09, with the aim of quickly bringing our performance in all areas up to a level that is at least satisfactory.

3. We have identified the forthcoming Hampton Implementation Review of the FSA and the four other major national regulators as an opportunity to secure an external perspective that supplements our own assessment of performance.

4. Finally, we reflect on the second six-monthly assessment by the Better Regulation Executive and its independent moderation panel of the better regulation performance of the FSA. This concluded that the FSA has made strong progress across the areas included in the assessment. We have identified actions we already have in hand, which address the suggestions made by the moderation panel and will further improve the FSA’s performance.

5. The Board is asked to:

   • agree the criteria for being a world class regulator (paragraph 4 and Annex B);

   • agree the areas identified for action, and the development of an action plan by January 2008 (paragraphs 5-8 and Annex C);

   • agree that we should formally ask the Hampton Implementation Review team to assess FSA against the criteria for being a world class regulator, in order to supplement our assessment of the FSA’s performance with an external perspective (paragraph 10); and
• **note** the BRE assessment of FSA progress on better regulation, and in particular that all the proposed future actions are already in hand (paragraph 11 and Annexes D and E).
BEING A WORLD CLASS REGULATOR

Issue

1. To agree the characteristics of excellence in regulation that the FSA should aspire to; and to agree further action we might take in order to improve our end to end regulatory performance and deliver excellence, integrating both our internal objective to become a world class regulator and our contribution to the external better regulation agenda.

Strategic Aims

2. The objective of the FSA is to maintain and improve consumer protection in relation to food and drink. In doing so, the FSA has access to and uses a range of direct and indirect levers to influence the behaviour of businesses, including through consumer information and advice. We have published a regulatory framework\(^1\) which sets out the factors we take into account when deciding whether, when and how to take action that has a regulatory impact.

Discussion

Improving the performance of the FSA as a world class regulator

3. In order to achieve its goal of being a world class regulator, the FSA should now look beyond its regulatory framework and aim to deliver excellence in all regulatory activity consistently across its remit.

4. Before we can decide how we might deliver excellence in all regulatory activity, we need to define excellence in this context. Our criteria also need to reflect the need for excellence across the whole regulatory chain – from design, to negotiation, to implementation, to enforcement, with effective evaluation and feedback to close the loop. There is already a considerable body of thinking we can draw on to define excellence such as the Better Regulation Task Force’s five principles of good regulation\(^2\). Building on previous Board discussions, we propose the criteria at Annex B as those against which the FSA should judge itself and monitor progress towards being a world class regulator.

5. For each of the criteria we propose, we have sought concrete examples of policies, activities and interventions that the FSA has developed and delivered in order to make an evidenced, qualitative assessment the FSA’s performance to

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\(^1\) See [www.food.gov.uk/multimedia/pdfs/FSAregframework.pdf](http://www.food.gov.uk/multimedia/pdfs/FSAregframework.pdf) - published 11 December 2006

\(^2\) Proportionate, accountable, consistent, transparent and targeted
date. These assessments, provided in Annex C, have allowed us to broadly classify our performance against each of these criteria into:

- areas where we are already performing at a high level, which we need to maintain;
- areas where our performance is satisfactory – a focus for continuous improvement; and
- areas where we need to develop our performance – a focus for step-change improvement.

6. For each of the areas in the first two categories above, we propose to work with policy teams across the organisation to embed and maintain awareness of the challenges of being a world class regulator, and to use the annual departmental Simplification Plan as a vehicle for championing and reporting on continuous improvement activities.

7. The assessment has identified the following as areas where we need to focus now on developing our performance:

- we need to develop and use an understanding of the reality of running food businesses in order to develop practical and timely interventions;
- we need to embed in the organisation a consistent understanding of the characteristics of market failure, to support our intention to intervene to protect consumers where the market is not balanced, not effective, or does not provides proper levels of protection;
- we should evaluate the success of all our interventions that have a regulatory impact;
- we should learn from and act on the assessments that we and others make of our performance; and
- we should work in partnership with others to achieve common goals.

8. For each of these, we will develop an action plan by January 2008 to deliver a step-change improvement in performance. We will identify opportunities for further work with Board members in the development of the action plans. The reviews proposed in Annex C may lead to further areas for improvement being identified through 2008; we propose a similar approach is taken to each such further area.
Forthcoming opportunities to supplement our assessment of performance

9. We have acknowledged, through the incorporation in Annex C of proposed criteria that relate to changing the regulatory landscape, that the FSA does not operate in isolation. The corollary of our ambition to change the regulatory landscape is the need to be a porous organisation, open to external ideas and responsive to external assessments of our performance. Such an approach would allow us to:

- determine our “market position” relative to other regulators;

- learn from others, adapting and adopting approaches to regulation and enforcement that have been successful in other sectors and settings; and

- understand the views of others on our direction and pace of travel.

10. The programme of Hampton Implementation Reviews\(^3\) provides us with an early opportunity to gain the views of others on our regulatory performance, and to learn from approaches taken by other regulators. The programme of reviews, announced in the Pre-Budget Report 2006, will be undertaken by the National Audit Office and the Better Regulation Executive (BRE) and will focus on extent to which regulators are performing in line with the better regulation principles proposed by Philip Hampton in his 2005 report\(^4\). A review of each of the five major national regulators\(^5\) will be completed in the coming months, with the FSA review currently scheduled for the second half of November. An explicit objective of the review programme is the identification and dissemination of good practice in the regulatory community, which provides opportunity for us to learn from others. We propose that the FSA should formally ask its Hampton Implementation Review team to critique those of the criteria for being a world class regulator that fall within the scope of the review, and to assess our performance against them, in order to provide an external perspective to supplement our own assessment.

11. The FSA has recently received its second departmental better regulation performance assessment from BRE. As previously, the FSA was assessed against four criteria – perception and policy burden; administrative burden reduction; delivery and risk-based enforcement; culture and capacity – and the assessment was moderated by an independent external panel. William Sargent, Executive Chair of BRE, has written to the FSA Chair with the results of the assessment and some suggestions for future action (Annex D). Overall, the

\(^3\) See www.cabinetoffice.gov.uk/regulation/reform/hampton/index.asp  
\(^4\) Reducing Administrative Burdens: Effective Inspection and Enforcement; see www.hm-treasury.gov.uk/budget/budget_05/other_documents/bud_budget05_hampton.cfm  
panel concluded that there has been strong progress since the first assessment, with strengths in stakeholder engagement, the development of governance structures and internal systems to support better regulation, systematic and focused regulatory simplification activities, and programmed reviews of the delivery of enforcement. The panel also proposed action in each of the following areas:

- a continuing contribution to the UK’s wider leadership on EU better regulation, including on key areas such as food labelling;

- development and delivery of a strong 2007 Simplification Plan, which includes a focus on the costs of the food hygiene regime and a trajectory to achieve the target for administrative burden reduction previously agreed by the Board;

- consideration of establishing a target for the reduction of administrative burdens on the business and voluntary sectors that arise from directly applicable EU legislation;

- strong progress in delivering the new risk-based enforcement regime, and on evaluation of “scores on the doors” pilots and the review of delivery of meat hygiene controls in approved premises; and

- a continuing proactive approach to better regulation governance and culture change.

Action is already underway in each of these areas, and is summarised in Annex E.

**Conclusions and impact**

12. This paper proposes a process of defining criteria for being a world class regulator, assessing performance against each of the criteria, then planning and delivering actions to improve performance in identified areas. This process is intended to promote the effective and efficient use of internal resources, by:

- taking a systematic and coherent approach;

- prioritising new activity in those areas where most work is needed, with action planning in parallel with business and resource planning processes for 2008/09; and

- minimising burdens of reporting in other areas, by using the existing route of the annual departmental simplification plan.
13. The incorporation of relevant criteria for being a world class regulator into the Hampton Implementation Review of the FSA would provide both an external perspective to supplement our own assessment, and an opportunity for the FSA to influence the regulatory agenda more widely.

14. The assessment by BRE of the better regulation performance of the FSA concludes that the FSA has made strong progress across the areas included in the assessment and reinforces actions we already have in hand to further improve the FSA’s performance in this area.

**Board Action Required**

15. The Board is asked to:

- **agree** the criteria for being a world class regulator (paragraph 4 and Annex B);

- **agree** the areas identified for action, and the development of an action plan by January 2008 (paragraphs 5-8 and Annex C);

- **agree** that we should formally ask the Hampton Implementation Review team to assess FSA against the criteria for being a world class regulator, in order to supplement our assessment of the FSA’s performance with an external perspective (paragraph 10); and

- **note** the BRE assessment of FSA progress on better regulation, and in particular that all the proposed future actions are already in hand (paragraph 11 and Annexes D and E)
TIMELINE OF PREVIOUS BOARD DISCUSSIONS

April 2007

Board workshop on becoming a world class regulator, which included a first discussion of criteria for excellence in regulation and briefing from FSA officials on some of the challenges in achieving excellence in regulation.

February 2007

The Board noted the first assessment of FSA better regulation performance by the Better Regulation Executive and its independent moderation panel. See Board paper FSA 07/02/08, FSA & Better Regulation: Progress in 2006.

September 2006

The Board agreed for publication the FSA’s first departmental simplification plan, and agreed a target for the reduction of the net administrative burden of food regulation by £11.9 million by April 2010. See Board papers FSA 06/09/06, FSA Simplification Plan: Approval for Publication, and FSA 06/09/07, Administrative Burdens Reduction Project: Agreement of Target.

November 2005

Board retreat, which included initial discussions of the FSA’s role as a regulator. At this workshop, the Board developed the view that although the interventions used by the FSA include a wide range of alternatives to regulation, many of our interventions have a regulatory impact.

October 2005

As a first stage in its consideration of the FSA’s role as a regulator, the Board considered and agreed a policy statement on the range of regulatory tools used by the FSA to deliver its statutory objectives. See Board paper FSA 05/10/02, Protecting Consumers: The Food Standards Agency Role as a Regulator. This
policy statement was subsequently incorporated into the FSA’s regulatory framework, published in December 2006.
PROPOSED CRITERIA FOR BEING A WORLD CLASS REGULATOR

Delivering outcomes
- regulators cannot claim to be world class unless they are effective – actually delivering the protection they were created to provide;

Practical and timely interventions
- world class regulators:
  - focus on practical and deliverable solutions;
  - focus on outcomes, rather than inputs and processes;
  - are timely in the interventions they make;
  - work collaboratively with their enforcement partners to help responsible businesses comply.

Consistent, risk-based, proportionate and transparent decision-making
- world class regulators:
  - are consistent in their approach to the analysis of issues, acting on the basis of risk, evidence and sound science;
  - act proportionately and take account of costs and benefits, but are appropriately precautionary where evidence is incomplete;
  - act openly and transparently, adopting a consultative approach and being accountable for their actions;

Using the market and applying effective incentives and sanctions
- world class regulators:
  - intervene to protect consumers where the market is not balanced, not effective, or does not provides proper levels of protection – but only where the benefits justify action and outweigh the risks of inaction;
  - use the market, where appropriate, to achieve change – minimising regulatory and administrative burdens where this does not compromise outcomes;
  - drive improvement and reward good performance, whilst seeking firm action against those who persistently fail to meet acceptable standards, or negligently expose the consumer to serious risks.
Continuous learning
• world class regulators:
  o have systems in place to review risks, priorities and levels of tolerance and to adjust what is regulated and how it is regulated to reflect changing circumstances;
  o evaluate the success of their regulatory interventions; and
  o learn from and act on the assessments that we or others make of our performance.

Delivering value for money
• world class regulators:
  o are efficient – finding the best way to get things done;
  o are economical – making best use of public money, and minimising costs without reducing quality; and
  o develop their people.

Changing the landscape
• world class regulators:
  o are not only reactive, but influence others and set the regulatory agenda – locally, nationally and globally; and
  o work in partnership with others to achieve common goals.
## ASSESSMENT AGAINST PROPOSED CRITERIA

<table>
<thead>
<tr>
<th>Assessment</th>
<th>A</th>
<th>B</th>
<th>C</th>
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<tbody>
<tr>
<td><strong>1. Outcomes</strong></td>
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<tr>
<td>1.1 We are effective, and deliver the protection we were created to provide</td>
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<td><strong>2. Practical and timely interventions</strong></td>
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<td>2.1 We focus on practical and deliverable solutions</td>
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<td>2.2 We focus on outcomes, rather than inputs and processes</td>
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<td>2.3 We are timely in the interventions we make</td>
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<td>2.4 We work collaboratively with enforcement partners across the UK to help responsible businesses comply</td>
<td>Review impact of current changes in summer 2008</td>
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<td><strong>3. Consistent, risk-based, proportionate and transparent</strong></td>
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<td>3.1 We are consistent in our approach to the analysis of issues, acting on the basis of risk, evidence and sound science</td>
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<td>3.2 We act proportionately and take account of costs and benefits, but are appropriately precautionary where evidence is incomplete</td>
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<td>3.3 We act openly and transparently, adopting a consultative approach and being accountable for our actions</td>
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<td><strong>4. Using the market</strong></td>
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<td>4.1 We intervene where the market is not balanced, not effective or does not provide proper levels of protection – but only where the benefits justify action and outweigh the risks of inaction</td>
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<td>4.2 We use the market, where appropriate, to achieve change – minimising regulatory and administrative burdens where this does not compromise outcomes</td>
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<td>4.3 We drive improvement and reward good performance, whilst seeking firm action against those who persistently fail to meet acceptable standards, or negligently expose the consumer to serious risk</td>
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<td><strong>5. Continuous learning</strong></td>
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<td>5.1 We have systems in place to review risks, priorities and levels of tolerance and to adjust what is regulated and how it is regulated to reflect changing circumstances</td>
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<td>5.2 We evaluate the success of our regulatory interventions</td>
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<td><strong>6. Delivering value for money</strong></td>
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<td>6.1 We are efficient – finding the best ways to get things done</td>
<td>Review following implementation of current initiatives</td>
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<td>6.2 We are economical – making the best use of public money and minimising costs without reducing quality</td>
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<td>6.3 We develop our people</td>
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<td><strong>7. Changing the landscape</strong></td>
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<td>7.1 We are not only reactive, but influence others and set the regulatory agenda – locally, nationally and globally</td>
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<td>7.2 We work in partnership with others to achieve common goals</td>
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**Key:**
- A – Already performing at a high level – which we need to maintain
- B – Performance satisfactory – focus for continuous improvement
- C – Development needed – focus for step-change improvement

**Notes:**
- * - the development an understanding of the practicalities of running food businesses is a particular need within this criterion.
- ** - we now need to embed in the organisation a consistent understanding of the characteristics of market failure.
BEING A WORLD CLASS REGULATOR

1. Outcomes

1.1 We are effective, and deliver the protection we were created to provide

What it means for us – our aspiration

Delivering measurable improvements in food safety, consumer protection and informed consumer choice for all.

What have we achieved?

We can demonstrate progress towards key consumer protection outcomes. Perhaps the clearest evidence is the 19.2% reduction in the incidence of foodborne illness between 2001 and 2006, close to the ambitious 20% target the FSA set itself in its first strategic plan. We have also already achieved small but significant decreases in population average sodium intakes, following the FSA salt campaign and associated initiatives.

Our annual report 2006/07, *Protecting the Interests of Consumers*, reports other key gains in food safety, consumer protection and informed consumer choice in just that year, including:

- assisting 28,500 small food businesses to comply better with food safety regulations;
- target nutrient specifications for manufactured foods used in school meals;
- allergy alerts by email and text message to consumers at risk; and
- new methods to spot ‘organic’ labelling fraud.

The process of reviewing the strategic plan, introduced in 2006, provides the opportunity to measure and report progress against strategic targets and ensure that the plan is an evolving, dynamic document that is fit-for-purpose.

We have made clear that the current focus on better regulation does not dilute the FSA’s statutory objective of protecting public health and consumers’ other interests in relation to food and drink. In this regard, the Chief Executive has given an undertaking that, should it become apparent that the FSA’s better regulation targets could not be met without risk to consumer protection, the Executive would have a duty to report to the Board.

A preliminary assessment

Our performance against this measure is already good. New work, such as on horizon scanning and on risk prioritisation will further sharpen our focus and will help identify new strategic objectives relating to effective consumer protection in the future.

BEING A WORLD CLASS REGULATOR

2. Practical and timely interventions

2.1 We focus on practical and deliverable solutions

What it means for us – our aspiration

We have an understanding of the practicalities of running diverse food and feed businesses, large and small, and apply this to policy development in order to ensure our interventions are practical. We have an understanding of how food and feed law enforcement is delivered, and apply this to policy development in order to ensure our interventions are deliverable.

What have we achieved?

We achieved a step-change in imported food enforcement in 2003/04, and have subsequently responded to recent changes in EU food hygiene legislation in a way that demonstrates our focus on practical and deliverable solutions – and our knowledge of the practicalities of food law enforcement:

- For the first time, food hygiene law now covers 150,000 businesses in the primary production sectors. Given this blank canvas for enforcement, the approach adopted by the FSA includes a number of elements to allow best possible use of evidence available. Examples of intelligence, which the enforcement authority may use to consider inspection frequency, include membership of a ‘recognised’ farm assurance scheme (see 2.4, below); track record of compliance; and intelligence generated by other statutory inspections.
- *Safer Food, Better Business* and *Cooksafe* are highly successful, simple to use food safety management system for small businesses. The FSA convened and led the multi-disciplinary team that developed these tools and which included enforcement officers, professional bodies, industry representatives and experts. *Safer Food, Better Business* was piloted with over 1000 small businesses to test effectiveness. *Retailsafe* built on the *Cooksafe* brand and structure, and has been developed for retailers handling unwrapped high-risk foods.

A preliminary assessment

Our response to the changes in EU food hygiene legislation demonstrates our focus on practical delivery in this area of food law enforcement. We now need to focus on applying the same thinking to the delivery of other areas of food law enforcement.

The need to develop an understanding of the practicalities of running food businesses was identified in the Sudan I Review (to be presented to the September 2007 Board meeting) and previously in the 2005 independent review of the FSA by Baroness Dean. This particular aspect of the criterion remains a significant development need.
BEING A WORLD CLASS REGULATOR

2. Practical and timely interventions

2.2 We focus on outcomes, rather than inputs and processes

What it means for us – our aspiration

Our targets and measures of success focus on delivering real and tangible improvements for our diverse stakeholders. We are shifting the focus from enforcement to compliance.

What have we achieved?

On policy issues, we live up to our core value of being evidence-based, focusing on the outcomes we want to achieve, such as in framing our strategic targets to reduce average adult salt intake to 6g/day, or tackling food safety problems at source, before they become incidents.

The new vision for food law enforcement puts the emphasis on delivering compliance, as the best proxy for the outcome of improved consumer protection. The Changing Local Authority Enforcement (CLAE) programme is reviewing the architecture for local authority food law enforcement in the light of this emphasis, and the recent survey of compliance provides a baseline measure. Most notably, the FSA has for the first time agreed with local authorities a performance indicator that relates to food business compliance, rather than enforcement and inspection inputs.

A preliminary assessment

We are evidence-based and this provides a natural focus for policy work on the consumer protection outcomes we want to achieve.

We need consistently to apply a focus on outcomes across all our enforcement activity. Improvement in our relationships with enforcement partners, primarily in local authorities, is a current focus and should allow us to deliver more outcome-focused interventions in food businesses.
BEING A WORLD CLASS REGULATOR

2. Practical and timely interventions

2.3 We are timely in the interventions we make

What it means for us – our aspiration

We are plugged in to developments in the external environment and foresee new challenges. We act swiftly in order to stop problems growing. We don’t prevaricate when action is needed.

What have we achieved?

Every year the FSA responds to a wide range of food incident notifications. In 2006, we investigated 1,342 incidents in the UK and took prompt action where it was needed to protect consumers and their interests in relation to food and drink. Incidents ranged in risk and complexity from the national outbreak of Salmonella montevideo associated with chocolate to more routine notifications of small fires and small-scale chemical spills. In terms of timely action, last year we issued 81 Food Alerts to local authorities and 478 notifications to the European Commission, via the Rapid Alert System for Food and Feed. In all cases, risk assessment, risk management and communication lie at the heart of the FSA’s response procedures, which we keep under continual review, learning from experience. In the last year, to ensure that a timely response can be maintained, we established a team of nearly 50 incident reserves we can call on to assist in any major or complex incident or investigation in any part of the FSA.

The FSA is very adept at horizon scanning on the EU legislative front, with the consequence that we are able to introduce implementing legislation at short notice. For example, the FSA was recently been able to introduce implementing legislation at short notice to give effect to new EU rules on BSE controls. Without that urgent action, the revised Community provisions would have been unenforceable.

A preliminary assessment

We are highly responsive to food incidents, acting swiftly in order to maintain consumer protection. The focus on continuous improvement, rather than large scale review and revision, is appropriate in this area.

The FSA is also developing its horizon scanning capability, which should improve our ability to foresee new challenges in the medium to long term.
BEING A WORLD CLASS REGULATOR

2. Practical and timely interventions

2.4 We work collaboratively with enforcement partners across the UK to help responsible business comply

What it means for us – our aspiration

Collaboration with our enforcement partners is consistently good and effective. Together, we develop and deliver a suite of effective interventions.

What have we achieved?

We are changing our approaches to collaboration with enforcement partners:
- introducing an intelligence and risk-based approach in primary production, which is now subject to food hygiene enforcement (see 2.1, above);
- focusing on the development of a more evidence and risk-based approach to the regulation of meat hygiene enforcement and meat inspection activities (see 6.2);
- signing a partnership agreement with the Local Authority Co-ordinators of Regulatory Services; and
- developing a sweeping revision to the approach to food law enforcement by local authorities, through the Changes in Local Authority Enforcement (CLAE) project, to be implemented by April 2008.

These approaches align with the emerging view that excellent local authority regulatory services are in-touch, reflexive, strategic and intelligence-led, and should enable the delivery of more outcome-focused interventions in diverse food businesses.

We have already had significant successes in developing and delivering new, effective interventions through and with the 469 local authorities responsible for food and feed law enforcement. We are in the early stages of a project to reduce burdens and deliver new compliance tools in a discrete market sector, following the success of the earlier Specialist Cheesemakers’ Initiative, which resulted in 96% of participating businesses subsequently operating a satisfactory food safety management system.

A preliminary assessment

We have an ambitious agenda for change and will need to ensure it delivers. We will need to review achievements against the criteria for world-class regulation in summer 2008.
BEING A WORLD CLASS REGULATOR

3. Consistent, risk-based, proportionate and transparent

3.1 We are consistent in our approach to the analysis of issues, acting on the basis of risk, evidence and sound science

What it means for us – our aspiration

We should be consistent and evidence-based in our approach to policy analysis – in line with the FSA core values.

What have we achieved?

Work over the past two years has delivered robust processes to ensure good governance of science in the FSA, and assurance tools for use by the Board. We also have a coherent approach to risk, recently praised by the Better Regulation Commission.

The FSA is establishing a General Advisory Committee for Science, which should further strengthen consistency in the use of science through its role in independently challenging and advising on how the FSA collects and uses scientific evidence and advice. The Committee's agenda embraces horizon scanning, science governance, developing good practice and informing science priorities.

A good practical example of our evidence-based approach was the recent Board decision on mandatory fortification with folate, and its extensive scientific and technical foundations.

A preliminary assessment

This remains a key strength of the FSA, and is recognised as such by a wide range of stakeholders. The Strategic Plan to 2010 commits us “to continue to act on the best available science and evidence”. We need stay vigilant to ensure we continue to act consistently across the FSA.
3. Consistent, risk-based, proportionate and transparent

3.2 We act proportionately and take account of costs and benefits, but are appropriately precautionary where evidence is incomplete

What it means for us – our aspiration

We recognise that the FSA will be rightly judged not only on the basis of what it does to protect consumers, but also how it does it – seeking smart and effective solutions that deliver benefits whilst avoiding unnecessary burdens.

We can demonstrate how we meet our statutory duty that, when deciding whether and what to do, we take into account risks, uncertainty, costs, benefits and expert advice.

What have we achieved?

In October 2005, the Board agreed that relevant costs included regulatory and administrative costs to businesses, costs to the public purse, and wider indirect costs; benefits include improvements to public health and consumer choice, and potential benefits to industry and other stakeholders. We review these costs and benefits in the impact assessments we generate, consult on and publish for both regulatory measures and significant alternatives to regulation.

A preliminary assessment

We have to ensure, as ‘impact assessments’ are introduced to replace ‘regulatory impact assessments’, that we maintain the high quality of our analysis of costs and benefits, and that this analysis informs our policy decisions. We also have to ensure that we meet statutory duties in relation to assessing impacts of race, disability and gender equality.
BEING A WORLD CLASS REGULATOR

3. Consistent, risk-based, proportionate and transparent

3.3 We act openly and transparently, adopting a consultative approach and being accountable for our actions

What it means for us – our aspiration

We don’t just seek views on our own agenda, we also actively seek and listen to the concerns of diverse stakeholders, and explain the basis for our policy decisions.

What have we achieved?

We actively listen to the concerns of stakeholders which are expressed in the Chief Executive’s stakeholder forums,7 or in the meetings that senior FSA officials have with diverse stakeholders.8

In February 2007, the Board agreed a set of principles related to our openness of operation, which included recognition that the FSA is answerable to the public and needs to hold itself open to scrutiny.

The FSA has considerable experience in developing and applying means of stakeholder engagement in the policy process, such as in the review of the Over Thirty Month rule for cattle. However, Baroness Dean noted in her 2005 review that “a number of stakeholders from across the groups felt that the Agency does not always pay due regard to externally-produced information – scientific and non-scientific”. Our Strategic Plan to 2010 commits us to “proactively seek the views of consumers and stakeholders”, through initiatives such as our new Citizens Forums on Food.

The House of Commons Science and Technology Committee, in its 2006 report on Scientific Advice, Risk and Evidence Based Policy Making, called the FSA “in many ways a model of transparency”.

The FSA as a whole – Board and Executive alike – needs to ensure that it welcomes, listens and responds to views from all stakeholders. The Board has commissioned proposals, to report in October 2007, for regular themed meetings and an annual accountability meeting. This latter meeting has the potential to be a significant example of good practice in public sector governance.

A preliminary assessment

Our performance is generally good; the actions commissioned by the Board will help deliver greater transparency and accountability and the new public affairs team is leading work across the Executive on stakeholder engagement.

7 http://www.food.gov.uk/aboutus/how_we_work/stakeholderforums/
8 http://www.food.gov.uk/aboutus/how_we_work/profiles/cedmeetings/cedmeetsjun07
BEING A WORLD CLASS REGULATOR

4. Using the market

4.1 We intervene where the market is not balanced, not effective or does not provide proper levels of protection – but only where the benefits justify action and outweigh the risks of inaction

What it means for us – our aspiration

We understand the characteristics of market failure and how we can address it.

What have we achieved?

Our published regulatory framework commits us to “consider intervening to protect consumers where the market is not balanced, effective or provides proper levels of food protection, but will only intervene where the benefits justify action and outweigh the risks of inaction”.

Front-of-pack nutrition signpost labelling and “scores on the doors” for catering establishments are two examples of where we are addressing information asymmetries in order to improve the functioning of the market.

A preliminary assessment

We now need to embed in the organisation a consistent understanding of the characteristics of market failure.
BEING A WORLD CLASS REGULATOR

4. Using the market

4.2 We use the market, where appropriate, to achieve change – minimising regulatory and administrative burdens where this does not compromise outcomes.

What it means for us – our aspiration

We understand the range of alternatives to regulation and deploy them where appropriate, working with the grain of the market where this is effective in delivering outcomes.

What have we achieved?

Our simplification plan 2006/07 details over £195 million in annual policy and administrative savings for the public and private sectors, achieved without compromising our objective of protecting public health.

We have launched significant initiatives on “scores on the doors” in catering establishments and on salt reduction. In both cases, we are using non-regulatory interventions that rely on voluntary co-operation with the market and seek to harness consumer demand in order to improve the functioning of the market.

We have engaged the European Commission in discussion on the potential to reduce burdens of regulation without compromising outcomes in its current and forthcoming reviews of food labelling, food hygiene, and official feed and food controls.

A preliminary assessment

This is an area where the FSA has a growing number of examples of good and best practice. Rapidly becoming a strength.
BEING A WORLD CLASS REGULATOR

4. Using the market

4.3 We drive improvement and reward good performance, whilst seeking firm action against those who persistently fail to meet acceptable standards, or negligently expose the consumer to serious risks

What it means for us – our aspiration

We develop and implement a coherent framework of sanctions and incentives that are effective in improving business compliance.

What have we achieved?

The Food Fraud Task Force, due to issue its final report shortly, was established to ensure that any loopholes in the law and in control procedures are identified and closed to make it as difficult as possible to carry out fraudulent activities. The scope of its work includes health marking, inspection and audit of food businesses, adequacy of the legal framework for prosecution, and suitability of penalties.

“Scores on the doors” has been identified as an exemplar in using consumer information to incentivise good performance by businesses. The recent report by the National Consumer Council and Better Regulation Executive, *Warning: Too Much Information Can Harm,* uses this initiative to demonstrate how the FSA is starting to grasp the potential of reputational regulation to achieve real change in market practices which have the potential to harm consumers.

The FSA provides active support to local authorities taking prosecutions, including, since 2003, the availability of a fighting fund to provide financial support for local authority enforcement actions where there is a risk to public health – whether as a result of recklessness (deliberately taking a risk) or negligence (failure to measure up to required standard) – or consumer choice is undermined, and when enforcement action would be in the public interest.

A preliminary assessment

This is another area where the FSA has a growing number of examples of good and best practice. The draft Regulatory Enforcement and Sanctions Bill includes provision for additional sanctions with the potential to be used in food law enforcement to deliver speedy and proportionate enforcement action against non-compliant businesses.

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5. Continuous learning

5.1 We have systems in place to review risks, priorities and levels of tolerance and to adjust what is regulated and how it is regulated to reflect changing circumstances

What it means for us – our aspiration

We are alive to changes in the external environment and how they affect food risks, and adjust our regulatory approaches accordingly.

What have we achieved?

We have responded to changes in science. For example, in response to the changing epidemiology of BSE, the FSA reviewed the Over Thirty Month (OTM) Rule that had banned the sale for human consumption of meat from cattle aged over 30 months at slaughter. Ministers accepted the advice of the FSA that replacing the OTM rule with BSE testing for cattle born after 1 August 1996 was a proportionate means of protecting consumers. This has led to increased revenue for farmers and significant savings to the public purse. The Better Regulation Commission, in its 2006 report on Risk, Responsibility and Regulation, used the OTM Rule review as an example of a targeted, post-implementation review of a policy area where the allocation of risk no longer reflected prevailing circumstances.

We have responded to changes in legislation. For example, following the introduction of new EU food hygiene legislation, we discontinued butchers’ licensing as the new law provided substantially equivalent level of public health protection. In doing so, we saved butchers £1.375 million in fees and form filling, and saved local authorities the expense of administering the licensing scheme.

We are also responsive to challenges from society and from our stakeholders. For example, Board of the FSA agreed in March 2006 that it would be important to assess independently the impact of its recommended approach to front-of-pack signpost labelling, and other front of pack key nutrient schemes that are in use, on consumer behaviour. Industry has expressed a willingness to work in a constructive manner with the Agency to carry out a study to learn together what works best for consumers. The FSA has also recently completed its review of the delivery of official meat hygiene controls in approved premises.

A preliminary assessment

The annual simplification plan process provides a framework for further work to keep our regulatory interventions under review and adjust them in response to the external environment. This process has a significant profile and support within the Executive team.
BEING A WORLD CLASS REGULATOR

5. Continuous learning

5.2 We evaluate the success of our regulatory interventions

What it means for us – our aspiration

We schedule evaluation into our plans for all significant regulatory interventions, so we can identify whether the benefits we expected are being delivered consistently and the costs aren’t exceeding our forecasts. We use this information intelligently to review and revise the interventions.

What have we achieved?

In October 2005, we identified the need to evaluate our interventions in order to make better and evidence-based judgement on whether, for any given issue, the nature of the intervention should change over time, or even if any intervention is still necessary.

Robust evaluation remains an exception rather than a rule, leading to external criticism that we do not systematically validate the costs and benefits that we estimate in impact assessments. One notable example of evaluation has been our work on the salt reduction, which has evaluated the impact of the campaigns on public awareness and claimed behaviour, and surveyed urinary sodium to demonstrate a small but significant decrease in population average salt intakes. Another example is provided by our approach to food incidents, which includes a review and evaluation phase as a matter of course, with the Sudan I review an example of the robust processes we adopt for the review of the largest of incidents.

A preliminary assessment

We need to develop and apply processes for the consistent and systematic evaluation of our regulatory interventions, based on appropriate measures of effectiveness, and incorporating the views of diverse stakeholders. This area is now a priority for action.
BEING A WORLD CLASS REGULATOR

5. Continuous learning

5.3 We learn from and act on the assessments that we or others make of our performance

What it means for us – our aspiration

We learn from our experiences. We invite and welcome robust external, evidence-based assessment of our performance – and take action as a result.

What have we achieved?

The FSA commissioned an independent review by Baroness Brenda Dean of its performance in its first years, published in 2005. This continues to inform policy proposals today, such as those on openness considered by the Board in February 2007.

There have been a range of external assessments of our performance, from the 2003 National Audit Office report on improving service delivery, to the assessments by the Better Regulation Executive of our performance on better regulation issues. Work taken to address the recommendations of the latter assessment process has been successful in improving the FSA’s assessed performance between Autumn 2006 and Spring 2007.

The judicial review of the FSA’s handling of the LLRICE601 incident has been a source from which we are ready to learn lessons within the context of a broader review.

The FSA has taken up the recommendations in the report by Mark Courtney of the Cabinet Office in which he reviewed the FSA’s policy and practice on EU and international engagement.

The FSA is one of five major regulators whose regulatory performance is to be reviewed by the NAO and Better Regulation Executive by the end of 2007.

All EU Competent Authorities (Defra and the FSA in the UK) are subject to oversight through the Food and Veterinary Office of the European Commission and are subject to regular audits and inspections.

A preliminary assessment

The FSA is open to performance assessment. But implementation of recommended process improvements needs to be more consistent.
BEING A WORLD CLASS REGULATOR

6. Delivering value for money

6.1 We are efficient – finding the best way to get things done

What it means for us – our aspiration

We are able to identify the resources needed to deliver business objectives. We have a culture and processes that actively seek the best way to get things done.

What have we achieved?

The FSA Strategic Plan to 2010 commits us to “continue to develop the organisation and the way we work to be economic, efficient and effective in the way we manage our resources”. Tomorrow’s Agency, the FSA change programme, provides the means of delivering against this commitment. The following current projects will develop processes that more explicitly link resources to outputs and strategic outcomes:

- the FSA business planning processes for 2007/08 explicitly allocated staff and other resources to individual business objectives, aiding prioritisation and corporate planning. Further process improvements will be introduced for 2008/09; and
- the current Management Information System is being developed into a performance management and reporting process that supports timely decision-making.

A preliminary assessment

Tomorrow’s Agency should deliver the needed step-change in performance against this criterion. We will subsequently need to review its achievements against the criteria for world-class regulation.
BEING A WORLD CLASS REGULATOR

6. Delivering value for money

6.2 We are economical – making the best use of public money and minimising costs without reducing quality

What it means for us – our aspiration

We secure lower prices for the inputs we need to provide public services. We secure enhanced quality or quantity of inputs at no increased cost.

What have we achieved?

The review of meat hygiene controls which was reported to the FSA Board in July 2007, had as its objective “to ensure that the delivery of official controls in approved meat premises is providing necessary consumer protection in a targeted, risk-based and proportionate way that represents value for money for operators, taxpayers, consumers and Government”. This recognised that delivering official controls imposes significant costs on the FSA and other departments as well as on food business operators.

The FSA Strategic Plan to 2010 commits us to “continue to develop the organisation and the way we work to be economic, efficient and effective in the way we manage our resources”. Tomorrow’s Agency, the FSA change programme, provides the means of delivering against this commitment. A project to review and improve FSA procurement processes has been launched.

A preliminary assessment

The review of delivery of official controls in approved meat premises demonstrated the FSA’s focus on securing value for money in meat inspection and enforcement.

Tomorrow’s Agency should deliver the needed step-change in performance against this criterion in relation to FSA’s internal processes. We will subsequently need to review its achievements against the criteria for world-class regulation.
BEING A WORLD CLASS REGULATOR

6. Delivering value for money

6.3 We develop our people

What it means for us – our aspiration

We recognise that the development of our people is critical to our success. We continue to develop the organisation through growing the capability and capacity of our people to deliver.

We employ a range of professionals – policy specialists, scientists, statisticians and economists to name only a few – and we want them to be recognised as leaders in their fields.

What have we achieved?

The FSA successfully achieved Investors in People (iiP) accreditation in April 2004. Our 2006 staff attitude survey indicated that staff increasingly value the investment we make towards their development. Our informal assessment against the new iiP standard in November 2006 showed we had made good progress on the road to a full re-assessment against the standard, due in November 2007.

An enhanced learning and development plan was launched in 2006 following a major skills need analysis. Our development activity over the coming months is focusing on continuing to build the leadership and management capabilities of our senior and middle managers through tailored development activities. There will also be a need to develop specific skills within those of our staff who are directly involved in our regulatory activities. As we become clearer about the implications of being a world class regulator, we will identify those essential skills and provide appropriate development opportunities for our staff.

Tomorrow’s Agency, the FSA change programme, provides a framework for further projects that aim to deliver “a better place to work, with a culture built on high standards of leadership, effective staff development, stronger performance management and personal ownership and accountability”. An external review of the FSA HR strategy has been commissioned and completed to this end, and an action plan is being developed to implement the strategy.

A preliminary assessment

Existing evidence demonstrates continuous improvement against this criterion. Implementation of a new HR strategy would continue this process.
BEING A WORLD CLASS REGULATOR

7. Changing the landscape

7.1 We are not only reactive, but influence others and set the regulatory agenda – locally, nationally and globally

What it means for us – our aspiration

We take the initiative in influencing the regulatory agenda at all levels from local to global. We are effective in our work with the EU institutions, using networks and relationships to develop an agenda for proportionate consumer protection.

What have we achieved?

Locally, we established a working presence in four of the nine English Government Offices of the Regions in 2006, to support the Strategic Plan commitment to strengthen the FSA’s links and develop partnerships with diverse organisations at the local and regional level. Although the initiative is at an early stage, it has been very positively received by stakeholders in all four regions and has already improved local communications and built new, productive working relationships.

Nationally, we understand and discharge our responsibilities for delivery in each of the devolved countries, recognising different stakeholder needs and aspirations in our work with other government departments in Scotland, Wales and Northern Ireland as well as across Whitehall. The hygiene of food premises and the food in them is one of the five key priorities for local authority regulatory services. As one of the five major independent regulators, the FSA is influencing regulatory thinking for example through publication of our regulatory framework.

Globally, the FSA is developing an EU and international strategy, which will include further active engagement with other Member States and the European institutions to secure the changes necessary for a more risk-based, proportionate, targeted and cost-effective approach to food regulation. The FSA is also influential in Codex Alimentarius, the intergovernmental body that sets standards for food traded globally, where it represents the UK and has been elected to the Executive Committee of Codex, which sets the forward work programme. We are already influencing a developing global agenda on salt – the FSA has been approached by the UN World Health Organisation to establish a global Salt Action Network, which in turn is likely to be supported by EU action, co-ordinated by the European Commission.

A preliminary assessment

We have an extensive and coherent programme of activities through which we are effective in setting the regulatory agenda at the local, national and global levels, and performance in this area is steadily improving.
BEING A WORLD CLASS REGULATOR

7. Changing the landscape

7.2 We work in partnership with others to achieve common goals

What it means for us – our aspiration

We work collectively with a range of diverse organisations, at levels from local to international, and operational to strategic, in order to achieve shared objectives. Our partnerships have: clear, shared aims and objectives, clearly defined roles and responsibilities; good performance management; and an agreed exit strategy.

What have we achieved?

The salt campaign is probably the best example of FSA working in partnership with others – including key industry organisations, charities and other non-governmental organisations. The FSA has worked especially closely with different organisations at each stage of the campaign as we have developed collaboratively new strands of activity to support salt reduction; and over 70 businesses and trade associations have so far committed to salt reduction. The Nutrition Strategy Steering Group, established by FSA and Department of Health in October 2006, brings together government, industry, consumer organisations and health groups in England to work together across the broad public health nutrition front.

The FSA presence in the English regions is now starting to generate partnerships at the local and region level in England, adding to the partnerships that our offices have developed in Scotland, Wales and Northern Ireland.

A preliminary assessment

We are building a good reputation for effective partnerships at the local and regional levels and in the devolved countries of the UK. Partnership working nationally poses more challenges and the FSA needs to develop a more strategic approach.
As you know, our officials have been working with yours to look at the Food Standards Agency’s approach to the Better Regulation agenda, building on work we did together last autumn and action you have in hand for the coming period.

This work is very helpful to us in highlighting success and spreading best practice. I hope that the feedback I have provided is helpful to you and the FSA in developing your better regulation programme.

Once again, we used the following process:

- The BRE team leading on food issues discussed aspects of the agenda with your officials considering the evidence of your progress in each area;
- On the basis of this the BRE team and your officials worked together to develop a summary assessment of progress, agreeing those areas in which good progress had been made and those in which priority action is needed. You consulted your Board as this work was being finalised.
- The summary assessment was put to a small panel, chaired by me and comprising, officials from No. 10, HM Treasury and the wider Cabinet Office and two external business representatives. One of your team attended the panel meeting for the discussion.

The assessment focussed exclusively on the FSA’s impact on the private sector and covered four areas - as last time:

- Perception and policy burden:
- Administrative burden target:
- Delivery and risk-based enforcement:
- Culture and capacity:
The headlines from the panel’s assessment were:

- there has been strong progress across the areas looked at;
- stakeholder engagement was a strength though business perceptions of FSA policy delivery were mixed;
- governance structures and internal systems continue to develop supporting better regulation culture change across the FSA;
- work on simplification was focused and systematic and the Agency is confident that the target agreed by the Board can be delivered, with a further target for Category A to be proposed;
- important work on the enforcement regime and the MHS were underway and reflected better regulation principles.

Fuller summaries of the agreed assessment in each area follow.

**Perception and Policy Burden**

This area considers the policy burden imposed by the FSA on business and stakeholders’ perception of the way in which the FSA regulates. Again, we saw good progress. There are strong structures and processes for stakeholder engagement on policy such as the Chief Executive’s industry forum, and the parallel fora for the consumer and enforcement stakeholder communities. Consultation practice is also strong and innovative in important areas such as fast track EU legislation (Comitology). Stakeholders recognise the openness culture though business perceptions on policy vary: positive on Safer Food Better Business, split on signpost labelling and extension of nutrition labelling. We noted that FSA evaluation of the current local authority pilots would look to help drive consistency in local application of Scores on the Doors, a significant area of concern for business. The FSA followed best practice on Common Commencement Dates for new legislation.

Whilst the FSA’s statutory consumer remit limits primary consideration of business burdens the organisation has realised in its recently published regulatory framework that it will be judged by its stakeholders not just on what it does, but how it does it. There is a strong focus on delivering win/win outcomes for business and consumers. The statutory requirement to carry out cost/benefit analysis in exercising its functions underpins good impact assessment practice in the FSA. Work is in hand across the Agency to build on the policy savings in the first Simplification Plan with a major stakeholder event in June and there are plans for further detailed sector-specific study of burdens and irritants following the FSA’s earlier specialist cheesemakers’ initiative. Both recommendations of the Davidson Review (on EU regulation) have been delivered.

We also noted leadership in championing risk-based approaches in EU and saw scope for leadership on alternatives to regulation at EU level based on UK approaches to e.g. nutrition and front of pack labelling.
Suggested action over the next 6 months: a continuing contribution to the UK’s wider leadership on EU better regulation, including on key areas such as labelling. The work towards a strong 2007 Simplification Plan is also key.

Administrative Burdens Target

The 2006/07 Simplification Plan included projects to deliver against the overall baseline for the Agency, including the traceability review. We understand that the Board will be asked to approve a target which encompasses category A obligations (EU Regulations) in June. Further work on administrative burden reduction is strong and systematic with engagement of policy leads across the Agency. PwC had been commissioned to deliver the measurement of new burdens from regulations introduced since the 2005 measurement which would also inform Board discussions in June. Major reviews of forms and all guidance to business would be completed for this year’s Simplification Plan. The FSA secured through negotiation new EU Hygiene Regulations that allow flexible implementation – this has substantially mitigated the additional costs to business largely from the increase in the number of businesses covered. EU and SFBB reviews in the summer may identify some scope for further reduction. The Commission’s fast track proposal aims to support light touch for micro-business but it is unclear as yet how this can deliver and the FSA was working with BRE and other interested Departments on this.

Suggested action over the next 6 months: Consideration of a Category A target – which we would of course strongly welcome. Further focus on understanding the costs of the hygiene regime will be key including constructive engagement with the Commission and other Member States on simplification. The Agency felt very confident of having credible measures and trajectory for 2007/08 Plan to deliver the target agreed by the Board.

Delivery and Risk-based enforcement

Again, we looked at the approach to policy implementation and enforcement practices (adherence to the principles of regulatory enforcement set out in the Hampton Review). We noted the constraints imposed by EU requirement to have a National Control Plan with periodic inspections (not necessarily risk-based). The review of the FSA’s enforcement regime was underway – for completion in April 2008 – and included developing a significantly more compliance-focused approach in line with Hampton.

We had local authority and business intelligence that FSA requirements of local authorities were more highly prescriptive than those of other agencies, leaving them less flexibility in working with business. The Agency was active in addressing this and concerns about disconnect between central policy and front line inspection e.g. on hygiene (SFBB has been explicitly designed to allow proportionate approach). A regional presence is being piloted in 4 of 9 English regions, to strengthen engagement with local authorities.

The Hampton merger (Wine Standards Board to FSA) had been done 2 years ahead of schedule and the Board was content for Defra to consult on a
merger with the Drinking Water Inspectorate. The Review of the Meat Hygiene Service showed a strong desire to move to a risk-based model where business as usual delivers compliance.

The Agency had delivered its target of reducing food borne illness by 20%. Agency Pilots and evaluation are underway that should help tackle business concerns of the number and differing designs of Scores on the Doors systems with associated costs and potential for regulatory creep.

**Suggested action over the next 6 months:** we should work together to help ensure strong progress in designing the new risk-based enforcement regime, bringing enforcement practice in line with wider progress on the better regulation agenda. The Scores on the Doors project and evaluation should address business concerns whilst helping build compliance – again this is an area where collaborative working with the Cabinet Office may assist. The MHS review should deliver a risk-based model.

**Culture and Capacity:**

We noted the active engagement of the FSA Board and the food advisory committees in the devolved administrations on better regulation. The evidence/science-based culture for policy making was seen as strong. The regulatory framework published alongside Simplification Plan, with strong emphasis on better regulation principles, provided a basis for further proactive training on better regulation and enforcement across the organisation and with delivery partners. Safer Food Better Business and the current risk-based options review of MHS exemplified this.

There was strong and developing governance around better regulation with a new better regulation sub-group of Executive Management Board. The SCS-led Better Regulation and Consultation Branch (BRCB) had strong capacity to influence across the FSA – and strengthened these skills specifically with bespoke training. Policy leads actively seek advice and all impact assessments and consultations signed off by the BRCB. We also saw more targeted approaches to tackling weaker areas of better regulation practice: for instance administrative burdens experiences were shared and there was a simplification network. There was also strong and open dialogue with Commission and other Member States esp. Netherlands and Denmark on risk-based approaches and simplification.

**Suggested action over the next 6 months:** The proactive approach to Better Regulation governance and culture change should continue to help underpin a strong 2007/08 FSA Simplification Plan.
Finally, I would like to express my sincere thanks to your officials for their hard work and cooperation in this exercise.

Kind regards

[Signature]

William Sargent
**ANNEX E**

**ACTIONS IN HAND THAT ADDRESS RECOMMENDATIONS FROM THE MODERATION PANEL ON BETTER REGULATION**

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Action</th>
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<tr>
<td>A continuing contribution to the UK’s wider leadership on EU better regulation, including on key areas such as food labelling</td>
<td>The Board agreed at its June 2007 meeting to include these administrative burdens in its reduction target, noting that it would help in the delivery of a more risk-based and proportionate approach to the negotiation and implementation of European food legislation. This will inform our approach to significant EU food law dossiers, such as the review of food labelling.</td>
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<td>Consideration of establishing a target for the reduction of administrative burdens on business and voluntary sectors that arise from directly applicable EU legislation</td>
<td>These comments have been taken into account in the development of the 2007 Simplification Plan, which the Board will discuss in its October 2007 open meeting.</td>
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<tr>
<td>Development and delivery of a strong 2007 Simplification Plan, which includes a focus on the costs of the food hygiene regime and a trajectory to achieve the target for administrative burden reduction previously agreed by the Board</td>
<td>The Board accepted the recommendations of the review of meat hygiene controls in approved premises at its July 2007 meeting. The Changes in Local Authority Enforcement (CLAE) programme and “scores on the doors” project are progressing to schedule.</td>
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<tr>
<td>Strong progress in delivering the new risk-based enforcement regime, and on evaluation of “scores on the doors” pilots and the review of delivery of meat hygiene controls in approved premises</td>
<td>The 2007/08 work programme of Regulation and Consultation Branch includes internal communications activities to embed the regulatory framework in the FSA. This will be supplemented with the action planning proposed in this paper.</td>
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<tr>
<td>A continuing proactive approach to better regulation governance and culture change</td>
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