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Standards and Sustainability Branch
Food Standards Agency
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Our Ref: 3116

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Dear Pippa

Agency Approach to Sustainable Development in Policy Making

I am responding on behalf of the Seafish Food Legislation Expert Group, a cross-sectoral group composed of representatives from the various trade organisations of the UK seafood industry, from catchers through to retailers.

The Agency is committed to taking sustainable development into account in all of its activities and policy decisions. The purpose of the consultation is to seek stakeholder comments on the Agency's proposed approach to put this into practice.

In response to the particular areas where views were sought:

We should set priorities within sustainable development, whilst ensuring negative impacts in all areas of sustainable development are minimised.

One of the Agency's main priorities is 'consumer interest in relation to food'. Sustainability is of increasing importance to some consumers. Therefore it is right that it should be a priority within the Agency. However as food safety is a concern to a greater proportion of consumers, this should be given a higher priority than sustainability in any decision making process.

That food safety and nutrition should be a priority for the agency.

The Agency was set up in 2000 with the main objective to protect the health of the public and the interests of consumers in relation to food.

Therefore it is appropriate that the Agency's main priority should be to food safety and nutrition. However it would be a concern if resources within the Agency were diverted from the main priority of protecting public health in relation to food and allocated to assessing sustainability issues.

The Agency should consider the effect of its policies on other areas but only modify its policies if this can be done without having a negative effect on its main functions. It is also within its remit to work with other government departments, therefore it should work closely

with relevant departments to ensure that negative impacts of all policies can be minimised. This will also have an additional beneficial effect of reducing duplication of regulation between government departments that can create unnecessary regulatory burden on businesses.

The agency should take responsibility for the significant impacts of its policies by moderating policy where possible or advising and communicating on alternative action being taken;

It is important that the Agency takes responsibility for the impacts of its policies. But it should be noted that in the case of European Regulations, how far can the Agency go in moderating its policies? European Regulations are applicable in the UK as published in the official Journal so there is no scope for moderating them. Any additional measures taken to reduce any negative impacts identified could only be implemented through national measures. These would only be applicable to UK business and could not be applied to intracommunity trade. Therefore any such measures may disadvantage UK businesses.

We should seek to take a more integrated approach, working with other departments and stakeholders, in order to achieve greater sustainability; and

The Agency accepts that some areas will fall outside of its remit and expertise. In such cases it will seek input from other government departments and organisations. We support this policy as the best approach but would like to see guidelines as to how organisations would be judged as suitably knowledgeable and independent. Other government departments with the relevant expertise can be counted upon to provide independent and well-founded information; other organisations whether charitable or membership based may provide lower quality information, i.e. information that has not been subject to independent review or that is biased towards the interests of the organisation..

It is also important when selecting other departments and organisations to contribute views that a broad spectrum of organisation is included so that a balanced view is achieved in the mix of organisations.

We should not produce an impact assessment, for the reasons discussed.

The approach listed is in line with the current statement of general objectives and practices published by the Agency. This already states that the agency will have food safety and consumer interests as its main priority. In addition it will maintain and build effective links with other organisations and also promote links with other public bodies who may be affected by its work or whose work may affect that of the Agency. This policy of sustainability moves sustainability higher up the list of priorities to be considered in policy making but this should not be placed above the Agency's main priority of food safety and consumer interests.

In addition

It would appear that the Agency's review of its '2 a week' advice for fish consumption is being reconsidered in the light of sustainability of fish stocks. This new approach seems to have been followed in this case.

However, the stakeholder group initially invited to give views did not include representation from the fishermen's organisations. They were subsequently included following

representation from Seafish. If these organisations had not been included, those deciding on policy may not have had access to information about the work that the catching sector is doing to preserve fish stocks and fish responsibly. This could have lead to an unbalanced view of the current situation and the possibility of incorrect advice being given to the public and a decrease in fish consumption at a time when increased consumption is thought to be beneficial to health. This highlights the need to have guidance on the make up of stakeholder consultation groups.

Yours sincerely

Fiona Wright
Food Standards Officer