

Appendix 1

Proposed Approach to Retained EU Law for Food and Feed Safety and Hygiene

Closing Date: 14th October 2018

Belfast City Council welcomes the opportunity to comment on the Proposed Approach to Retained EU Law for Food and Feed Safety and Hygiene. Furthermore the Council welcomes that the Food Standards Agency has confirmed its priority, for when the UK leaves the EU, is to maintain the UK's high standards of food and feed safety. Whilst the Council wishes to see the Government agreeing a good deal for both sides with the EU, it recognises the need to plan for all scenarios, including the unlikely outcome that the UK will leave the EU without a deal in March 2019.

It is essential that the FSA and UK Government continue to work with Local Authorities and share information at the earliest opportunity regarding plans for day one scenarios for food law regulation, in particular in relation to export and import controls. Controls both inland and at ports must be considered.

Q1: Do you have any comments on the proposed approach to fixing inoperabilities in the retained EU Law for day one of Exit from the EU as set out in this consultation?

The Council without prejudice to potential future arrangements between the UK and the EU supports the proposals as necessary to ensure retained EU food law is operable on exit.

Q2: Do you identify any concerns or risks regarding the proposed approach to fix inoperabilities in retained EU Law that appear not to have been adequately addressed?

No

Q3: Are you aware of any impacts of the proposed measures that have not been identified in this consultation?

No

Q4: Do you agree with the impacts that have been identified within this consultation?

No comment

Q5: While this consultation addresses what is being done to ensure retained EU law functions on the day the UK leaves the EU, do you have any general comments on food and feed safety and hygiene in the UK after EU Exit?

1. Any future changes to regulatory controls after the UK leaves the EU should provide the same, or an improved, level of consumer protection.

2. Any changes to the current legislation should be commensurate with the risk posed by different activities and trades and minimise the regulatory burden on council's and food businesses.
3. In order to avoid the need for food safety checks on imports from EU countries the UK should continue to recognise EU food safety controls, including controls carried out at EU borders on 3rd country imports. This will be particularly important for Northern Ireland considering its land border with the Republic of Ireland, the significant cross border trade including frequent crossings by small traders. This would best be done as part of a reciprocal agreement with mutual recognition, to reduce the need for both additional import and export controls, to promote regulatory alignment, and facilitate UK-EU trade.
4. It is anticipated that some additional food safety controls/activities will be required by local authorities and port health authorities as a result of BREXIT and it is important that these should be either on a full cost recovery basis or funded by the UK Government to avoid additional financial burdens on local authorities.
5. The current checks at UK and EU borders on third country imports should be maintained to facilitate free movement of goods within the EU, and between the EU and the UK, and the UK should seek to maintain access to existing European Union IT and rapid alert arrangements.