Risk Analysis and Regulated Products Service Update

1 Purpose of the paper

1.1 This paper provides the Board with a routine update on the progress of issues in the joint Food Standards Scotland (FSS) and Food Standards Agency (FSA) risk analysis process and GB regulated products service.

1.2 The Board is asked to:

- **Note** the update on issues undergoing risk analysis and the status of the GB regulated products service.
- **Note and provide any early views** on areas that have been identified for regulatory reform.
- **Note** that FSS capacity for continued delivery of core risk analysis and regulated products functions, alongside any regulatory reform that is agreed with FSA, remains challenging.

2 Strategic aims

2.1 The work of risk analysis and the regulated products service supports FSS Strategic Outcomes: 1 – Food is Safe and Authentic; 3 – Responsible Food Businesses are enabled to thrive; 5 – FSS is trusted and influential. It also links to commitments made under Goal 1 of the Corporate Plan: to have a food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit.

3 Background

3.1 This paper provides the Board with an update on the performance of the FSS/FSA risk analysis process, covering the annual period up to the end of March 2023. This includes applications progressing through the regulated products service, and issues that the FSS/FSA has proactively chosen to consider. It considers current performance, emerging risks, issues and mitigations, as well as highlighting areas that are currently under active consideration for future regulatory reform with FSA.

3.2 Background information about the risk analysis process and regulated products service has been provided in the previous report to the Board in March 2023 and is available via this link on the FSS website.

4 Risk Analysis

4.1 Following establishment of the enhanced risk analysis process in January 2021 and its implementation in the first year of operation, our objective for 2022/23 was to review and further embed a structured risk analysis function in FSS, working with the FSA to deliver risk assessment and risk management outputs that support a food safety and standards assurance system that commands international respect and consumer confidence, in line with retained EU regulatory frameworks.

4.2 As at March 2023, there were 22 issues recorded on the public register, an increase of 15 issues since March 2022.

4.3 New issues in the past year include one additional issue commissioned by another government department, continuing the active cross-government work on border controls and FSS/FSA's responsibility to advise on essential food and feed safety requirements. In addition, the work has commenced on 14 issues identified through policy analysis, horizon-scanning and stakeholder engagement. This includes commencement of risk assessment and evidence gathering in relation to several food contact materials, chemical contaminants and residues, meat hygiene, animal feed and foodborne disease issues, and a review of the risk to human health of several genetically modified crop events.

4.4 Annex A gives more detail of the issues added in the past year.

4.5 In the second year of operation, alongside the FSA, key areas of FSS activity have included:

- Delivery of risk assessments on:
  - risk to vulnerable groups from the consumption of smoked fish contaminated with *Listeria monocytogenes*
  - risk assessment to support development of advice and guidance to manage outbreaks of norovirus in oysters
  - allergenic risks of the substitution of vegetable oils resulting from the invasion of Ukraine
  - risk to vulnerable consumers of *Listeria monocytogenes* in blue cheese

- Presented to relevant Scientific Advisory Committees, including on titanium dioxide and smoke flavourings.

- Worked with other government departments to determine the model parameters for import health risks of high-risk foods of non-animal origin and of animal origin.

- Completed work on a high-profile review of controls on imported food from Japan following the Fukushima nuclear incident, with the removal of enhanced sampling and controls for imports into Great Britain from June 2022.

- Delivered a review of controls on imports of high-risk food and feed of non-animal origin into Great Britain, with import controls updated in January 2023.

4.6 The growing caseload of issues at varying stages in the risk analysis process is in line with expectations. Risk analysis issues may take several years to progress, for example if a call for evidence is required, so the number of issues in the risk assessment stage will continue to grow. Other issues may be completed more quickly. Annex A shows the risk analysis caseload since the end of the transition period in January 2021, and the estimated earliest completion date for each issue (note that completion dates are based on several estimates and subject to change).

5 Regulated Products Service

5.1 In our update to the Board in March, we provided an analysis of the growing caseload in the Regulated Products Service (RPS), noting that we expect the caseload in risk assessment will continue to build and that the flow of products into the system will vary from year to year, which makes accurate future forecasting challenging. We also set out the expected authorisations due over the next 12-18 months. (See Annex B).

5.2 As discussed in March, we have made steady progress with authorisations, meeting the expected timetables (allowing for 'stop the clock' periods where FSS/FSA cannot progress applications until further evidence is provided by applicants). A further 3 applications have now been completed, bringing the total number of completed applications to 34 since the service went live in January 2021.

5.3 In summary:

- there are 438 applications progressing in the RPS, an increase of 36 since the March report, with 34 having been completed by March 2023;

- the main categories of product remain CBD (see para 5.4), Feed Additives and Novel Foods;

- the number of applications in the risk assessment phase continues to build, with an increase of 18 this quarter;

- we have an ambition to deliver around 60 authorisations this year, subject to resource constraints, that would bring the total number of completed applications to over 90 by March 2024.

5.4 CBD products continue to form a significant proportion of the caseload. Although the number of applications is large, these are being grouped by common characteristics or issues to efficiently assess these products. Progress with risk assessments will be dependent on whether the applications have sufficient information available to conclude the assessment or we need to request addition data.

5.5 Authorisation of CBD products is dependent on a change in the law to set an allowable limit for the presence of THC in consumer products. This legislation is the responsibility of the Home Office, who have confirmed plans to bring forward regulations although no timetable has been announced. A new issue has also arisen in relation to the use of extraction solvents in the production of CBD and we are working with applications to clarify the regulatory position. If additional authorisations are needed for the extraction solvents, this could extend the authorisation process.

6 Future service performance, risks and mitigations

6.1 As noted in the March Board paper, the risk assessment stage is where pressure may build up as this is the most resource intensive stage and where there is greatest uncertainty, as issues may not become clear until detailed work on a dossier has started.

6.2 The FSS/FSA working assumption remains that we should expect an average of 150 regulated products applications per year. It is not possible to accurately forecast the inflow of applications as this is dependent on commercial decisions, market, and agricultural cycles and, for novel foods, investment in innovation and market appetite for new products.

6.3 Based on this assumption, and recognising FSS dependence on the FSA for regulated products risk assessment capacity and expertise, the Board may wish to note that FSA plan to build capacity to complete around 100 regulated product risk assessments per year by March 2025, increasing to 120 regulated product risk assessments per year from April 2025 onwards. This forecast increase in completed risk assessments is dependent on the FSA recruiting an additional 6 risk assessors, and an increase in efficiency as newly recruited staff complete training and reach full capability (it takes around two years for a newly recruited risk assessor to reach expected capability and productivity levels).

6.4 Under these assumptions, we expect the total number of cases in the system to peak at around 490 in 2025, and to remain at around this average level – accepting that the flow into and out of the system is not smooth and so the actual total caseload will continue to fluctuate around the average.

6.5 The main risks to future delivery are:

- lack of FSS/FSA specialist resource to complete risk assessments, leading to fewer completions per year, and FSS policy capacity in Scotland to deliver the associated volume of authorisations in legislation;

- a surge in applications, for example if a new product class such as novel proteins reaches market viability and a large number of applicants come forward at the same time;

- ongoing issues relating to Retained EU Law, where the process of transferring into domestic regulations has not worked properly, creating problems in the authorisation process – these issues generally only come to light when a problem arises;

- general pressure on FSS/FSA resources, for example any work to consider reform of REUL by 2026, and any FSS science and policy input required to support other FSS priorities such as SVS or SAFER, which will draw on many of the same officials who are dealing with product authorisation.

6.6 In FSS, we are managing these risks by: keeping FSS's internal risk analysis and regulated products governance arrangements under review; progressing staff recruitment within existing budget constraints and consideration of internal efficiencies as part of the interim structure reconfiguration work; and working with FSA on potential options for future reform to streamline and improve efficiency within existing regulatory and administrative processes.

Continuous improvement

6.7 FSS/FSA have sought to implement continuous improvement to the regulated products service since it launched in January 2021. Examples include improved guidance, recruitment of additional science and policy staff, developing new arrangements for Scottish Government officials to discharge administrative tasks assigned to Scottish Ministers in retained EU law, establishing additional advisory committees and maximising efficiencies in the system such as 'batching applications'. Some improvements have been planned, such as the new Case Management System (CMS) being progressed by FSA, and others have been responsive, such as fixing elements of REUL that were inoperable in the UK context as problems arose.

6.8 In addition, we have reviewed FSS's internal risk analysis governance arrangements, refreshed the terms of reference for the FSS Risk Analysis Forum, and commenced recruitment of additional policy posts. Further detail on current FSS resourcing is provided in paragraph 8.2 below.

6.9 We have also completed a review of the risk analysis commitments in the FSS/FSA Memorandum of Understanding to ensure it accurately reflects roles and responsibilities for risk assessment and risk management.

6.10 Details of improvements introduced so far are detailed at Annex C.

6.11 In the coming year, FSS will also be working with FSA to:

- implement and roll out access to the CMS to improve workflow management and improve pre-application engagement and application quality.
- consider the use of other regulators' opinions to support some risk assessments.
- continuing to improve our guidance for applicants and pre-application support, within the constraints of current resources.
- using the new CMS to get better performance data so we can identify and report on areas for future improvement.

7 Future regulatory reform

7.1 Continuous improvement is important, but it will not produce the step change in delivery and customer experience that will be possible with more fundamental reform, should this be the direction agreed by FSS and FSA, and ultimately Ministers. Creating a modern, streamlined and effective regulated products service will bring benefits to consumers as new products come to market more quickly, including those with the potential to bring wider economic and environmental benefits, but this must not be at the expense of food and feed safety and our primary focus to protect public health in relation to food.

7.2 However, fundamental reform will require additional resources, and it will be challenging within existing FSS policy resource constraints to progress any agreed reform in Scotland, as part of any GB-wide reform programme, alongside delivery of core risk analysis and regulated products functions.

Retained EU Law – Regulated Products

7.3 In December 2022 the Board agreed the principles that will inform our discussions with UK Government departments on proposals for revoking and amending food and feed law using powers under the Retained EU Law (Reform and Revocation) Bill, and subsequent advice to Scottish Ministers.

7.4 Certain areas had already been flagged by both FSS and FSA as requiring review prior to the introduction of the REUL Bill. As noted above, this included the need to consider changes to streamline the process for approving regulated products, and we recognise there is the potential to pursue this using powers in the Bill. These changes would involve considerable preparatory work and analysis to deliver, including detailed policy development and consultation.

7.5 Discussions on this are ongoing with FSA, including proposals for:

- a common application gateway and standardised regulatory pathways for the different regimes;
- a quicker process through which authorisations come into force; and
- a more efficient process to record and communicate which products have been authorised.

7.6 Currently there are 12 separate regulated product regimes in GB with different legislative requirements and timelines that have been inherited from the EU. Notwithstanding issues around EU alignment, this is burdensome for applicants as they must familiarise themselves with multiple requirements, creating additional work and increasing the risk of error. FSS and FSA are currently exploring the possibility of creating a **Common Authorisation Procedure (CAP)** that will consolidate the process set out in legislation and create a standardised system with a single front door for applicants, so the applicant journey is more straightforward.

7.7 This would also consider scope for streamlining the process through which authorisations come into force after Ministers have made a decision. Currently all regulated product authorisations are confirmed by secondary legislation which impacts on the time it takes for new products to gain market authorisation. This is an effect of the way the regulations were transposed into a UK context, which requires 3-6 months to give effect to an authorisation decision in law and significant resource to lay regulations. When the UK was an EU member state, while tertiary (and often lengthy) legislative processes still needed to be followed, once the EU Commission and Member States agreed an authorisation decision it came into force quickly and directly on publication in the EU Official Journal.

7.8 FSS and FSA are currently exploring the development of consolidated positive lists/e-registers of authorised regulated products published on the Food Safety Authority's website. This would replace the current methods for listing authorised products, which varies by regime, including lists in legislation or having separate pieces of legislation for each authorisation. Whilst the development and maintenance of e-registers has associated costs, and issues around transparency and reduced parliamentary, scrutiny of technical authorisation decisions would need to be considered, this work could significantly streamline legislation and enhance accessibility. It would provide industry and enforcement officers with a common location to view lists of authorised products.

7.9 FSS will continue to engage with FSA on developing any reform proposals as detailed above, in line with the REUL principles agreed by the Board in December, that will inform our subsequent advice to Scottish Ministers.

7.10 We will continue to provide the Board with updates via this regular report and will bring future proposals to the Board for agreement.

Novel Foods Review

7.11 As highlighted in the March Board paper, FSS officials also continue to engage in discussions with FSA on a review of the Novel Foods Regulatory Framework (based on Novel Foods Retained EU Legislation) which FSA have identified as a priority area for reform for which there has been a public commitment by the UK Government.

7.12 The review commenced in January 2023 and reported in March 2023, and a summary of findings is due to be published on 7 June.

7.13 Policy officials in FSA are now reviewing the outputs of this FSA-led review, and considering the possible reform options. FSS officials continue to be engaged in this process to ensure Scottish interests are represented given the GB nature of the regulated products framework.

8 Resourcing

8.1 As noted above, we are aware FSA are looking to further increase its capacity across policy and science teams to manage the growing risk analysis and regulated products workload – in particular, risk assessment given it is the most resource intensive and takes the longest time to complete. As workload and FSA risk assessment capacity is being scaled up, it will be necessary to review how FSS science resource is most effectively allocated within our existing budget allocation, particularly expertise in toxicological risk assessment which forms the majority of issues subject to risk analysis, to maintain oversight of evidence and data relevant to Scotland. However, resource constraints will limit our ability to keep pace with growing demand, requiring us to keep priorities, and our scientific partnerships with the FSA under on-going review.

8.2 Similarly, consideration must be given to how the legislative aspects of risk management and regulated products authorisation are currently delivered by FSS, as both FSS and FSA rely on partnership working to coordinate policy and authorisations across GB. To meet the expected increase in demand, particularly for regulated products, FSS is currently recruiting five B2 policy posts, alongside consideration of divisional structural efficiencies as part of the interim structure reconfiguration work. This will increase capacity within the FSS regulated products team, including on feed additives, and ensure other core policy functions continue to be delivered.

8.3 Close working relationships and engagement remains in place between FSS and the FSA, through forums including the Risk Management Group and Workflow and Resources Group, as well as the joint project management approach to regulated

products applications. Where this enables resources to be pooled to manage workloads across FSS and FSA this will mitigate some of the resourcing challenges to an extent, in addition to the additional recruitment now underway.

9 Equality Impact Assessment and Fairer Scotland Duty

9.1 Equality Impact and Fairer Scotland Duty assessments are not considered necessary for this paper. The purpose of the paper is to provide an update on the issues going through the Risk Analysis Process and Regulated Products Service.

10 Conclusion

10.1 Current FSS capacity for continued delivery of core risk analysis and regulated products functions, alongside any regulatory reform policy development that is agreed with FSA, will remain challenging within existing resource and budget constraints. We will continue to prioritise consideration of any regulatory reforms that will bring greater efficiencies and improvements to the GB Regulated Products Service.

10.2 FSS officials will also continue to engage with officials in the FSA to consider the outputs of the Novel Food Framework Review, and determine where novel foods reforms may be appropriate for Scotland alongside any broader reform of the GB Regulated Products Service.

10.3 The Board is asked to:

- **Note** the update on issues undergoing risk analysis and the status of the GB regulated products service.
- **Note and provide any early views** on areas that have been identified for regulatory reform.
- **Note** that FSS capacity for continued delivery of core risk analysis and regulated products functions, alongside any regulatory reform that is agreed with FSA, remains challenging.

Please direct queries to:

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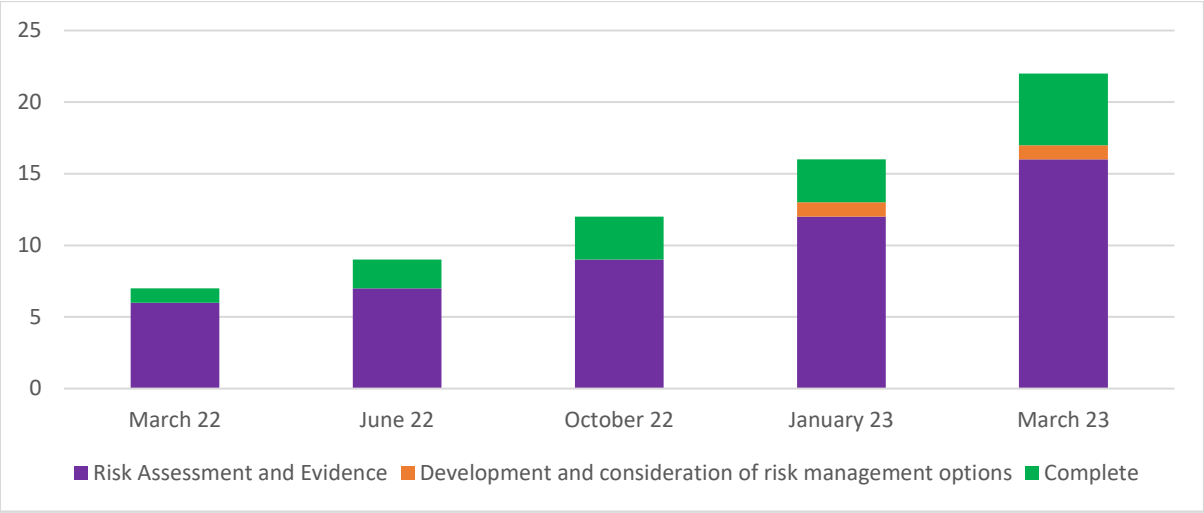
Annex A

Summary Statistics for risk analysis and regulated products

Risk analysis issues recorded in the public register:



Issue	Description	Estimated Completion
Imported Products Of Animal Origin (POAO) 2022 Controls Project	FSA/FSS work with Defra to consider the public health aspects of the Future Animal Imports Risk Review (2022). Our risk analysis input has been completed and has been sent to Defra to help with its policy development.	Complete
Review of Controls on Imports from Japan following Fukushima Incident	Review of the controls in retained EU Regulation 2016/6 imposing special conditions governing the import of food from Japan following the Fukushima nuclear power station incident. Review will consider latest evidence on levels of contamination in food from Japan to determine whether controls should continue and, if so, whether any amendments to the controls are required.	Complete
Risk Analysis of Minced Meat and Meat Preparations - Review of Prohibitions and Restrictions on Imported EU foods.	FSA/FSS work with Defra to consider the risk associated with imported chilled meat preparations (all species), chilled minced meat (bovine, porcine, ovine and caprine) and minced meat (poultry).	Complete
Review of imported food and feed controls under	To ensure that the proposed changes to the list of certain controlled food and feed products	Complete

Retained EU Commission Implementing Regulation 2019/1793	not of animal origin (FNAO) in the annexes of Retained EU Commission Implementing Regulation 2019/1793 outlined are appropriate	
Extension of tolerance period for traces of Ms1×Rf1, Ms1×Rf2 and Topas 19/2 oilseed rape	Three GMO events that were formally withdrawn from the market (Ms1×Rf1, Ms1×Rf2 and Topas 19/2) are currently granted a tolerance in a proportion of no higher than 0,1% mass fraction in adventitious or technically unavoidable presence. This is outlined under REUL 2019/1562 with this tolerance period expiring after 31 December 2022, wherein it would return to zero. The authorisation holder claimed that a technical zero presence would be unavoidable after the end of this tolerance period date and requested a review to extend the tolerance period to ensure its adventitious presence does not hinder the future trading of oilseed rape commodities.	Complete
Dioxin & Polychlorinated Biphenyls (PCB) Risk Analysis	Consideration of the need for changes to risk management measures following a reduction in the Health Based Guidance Value for dioxins. This may include changes to existing regulatory limits in food and/or revised consumer advice.	Risk assessment anticipated end 2025 at the earliest
Perfluorinated Alkyl Substances (PFAS) Risk Analysis	Consideration of risk management measures associated with Perfluorinated Alkyl Substances (PFAS), a broad range of often persistent industrial chemicals some of which have been reported in food.	Risk assessment anticipated end 2025 at the earliest
Analysis of the safety of Titanium Dioxide (E 171) as a Food Additive	On 6 May 2021 the European Food Safety Authority (EFSA) published an opinion on the safety of titanium dioxide (E 171) as a food additive. The EFSA panel concluded that E 171 can no longer be considered safe when used as a food additive. UK Scientific Advisory Committees will assess the EFSA opinion and any associated studies alongside the existing scientific evidence to provide a view on the safety of this permitted food colour. This will help inform what appropriate risk management action may be needed to safeguard consumers.	Risk assessment is anticipated to conclude in December 2023 (following data from COT/COM outputs). Subject to SAC timetabling, ACAF discussions will be held in early 2024. The earliest delivery date for the formal RA opinion is April to June 2024.
Risk analysis procedure for bamboo-plastic composite FCMs	Bamboo and similar plant-based materials are not considered to be authorised additives in plastic FCMs in accordance with Regulation 10/2011 (retained under domestic legislation in	Final COT statement and agreed risk management approach is expected early 2025 at the earliest.

	Great Britain), therefore a decision needs to be taken in respect of the GB market. The Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT) recently published their interim position statement on these articles.	
Ocean-bound plastic and plastic obtained from the environment used in food contact applications	The FSA and FSS are aware of the use of recycled plastic in FCM products that are in part, or fully, fulfilled using plastic material that has been obtained from the environment (ocean, 'ocean-bound' or land). We are carrying out risk analysis to assess the safety of using these materials in food contact applications.	The SACs (FCM JEG and COT) are expected to carry out a full evaluation of this material from April 2023 at the earliest.
Review of T-2/HT-2 Toxins in Foods	Review of occurrence data for T-2/HT-2 toxins in cereals and assessment of the exposure of UK consumers to these toxins from cereals and cereal-based foods.	Risk assessment anticipated March 2024 at the earliest. Complete risk management expected January 2025 at the earliest.
Direct supply of meat (including offal) to the final consumer (potential cold chain disruption) (Qurbani meat and offal during Eid al-Adha)	The FSA is evaluating whether there is any additional risk to consumers as a result of the supply and consumption of less than fully chilled Qurbani meat and offal during Eid al-Adha.	Although work has been completed on the public consultation exercise, progress to stage 2 and the long-term approach is currently paused due to work pressures associated with the Retained EU Legislation (REUL) Bill, and while we assess the impact REUL will have on the ability to introduce new measures in the current regulatory framework.
Country Profiles - Imported Food of Non-Animal Origin (FNAO) Phase 1	Production of Country Profiles for trading partners exporting food of non-animal origin (FNAO) to the UK. These profiles will assist in monitoring the risk associated with each country and to inform on the need for follow-up action.	
Risk assessment on Avian Influenza infection via food chain	The purpose of this work is to produce an updated risk assessment for avian influenza in food, triggered by changes to consumer advice regarding egg consumption and the geographically widespread nature of Avian	Risk assessment was completed in spring 2023. Further work on risk management (RM) may be required during 2023.

	Influenza generating over 100 hundred confirmed cases in the 2021/22 AI season.	
Assessment of TMBPF-DGE for use in can coatings	Evaluation of the safety of a substance used as a coating in metal food contact materials in respect of the UK market	The RA is expected to be completed in Spring 2023 with consideration of RM advice to follow later in 2023.
Assessment of the risk to vulnerable consumers from Listeria monocytogenes in blue cheese	Reviewing the evidence behind FSA/FSS advice on blue cheeses and the risk to pregnant women and other vulnerable consumers.	Anticipate publication of a RA and RM advice in Spring 2023 at the earliest.
Assessment of the risk to vulnerable consumers from Listeria monocytogenes in smoked fish	Reviewing the evidence behind FSA/FSS advice on smoked fish and the risk to pregnant women and other vulnerable consumers.	
Assessment of HPMA for use in can coatings	In 2012, EFSA assessed methacrylic acid, 2-hydroxypropyl ester (HPMA) for use in acrylic resin coatings for food cans at use levels up to 20%. The FSA will re-assess its suitability for use in coatings for placing onto the UK market.	Literature review anticipated to be completed Mid-June with a view of publishing risk management recommendation together with a view to publish HPMA and TMBPF-DGE at the same time – likely beginning of July
Risk assessment of substrates used to rear insects for animal feed	The FSA has commissioned a comprehensive review of the safety of several currently non permitted substrates that could potentially be used to rear insect larvae for protein in animal feeds.	Final report publication, and dissemination meeting ~between January and March 2024 at the earliest.
Review of the prevalence of certain mycotoxins in animal feed	Work to increase understanding of group A Trichothecenes; T2, HT2, Diacetoxyscirpenol (DAS) and Neosolaniol (NEO) and determine their prevalence in retail pet foods.	Risk assessment phase due to conclude at the earliest end of 2023.
Assessment of plant based drinks	The SACN/COT working group on plant-based drinks is considering the benefits and risks of plant-based drinks in diets across all life stages. The outcome of this analysis will inform public health guidance on the suitability of these products for different sub-populations.	Risk assessment phase due to conclude at the earliest end of 2023.

Vitamin D in infant and follow on formula	Review of the safety of vitamin D intakes from infant formula and follow on milks, in light of the updated regulations on the vitamin D content of these drinks and in the context of our existing advice for vitamin D supplementation in formula-fed babies.	The risk assessment has been completed with publication in preparation.

Annex B

Authorisations expected in the next 12-18 months

Description of applications	**(Estimated) Ministerial decision**	**Estimate of coming into force date (if approved by Ministers)**
8 GMO products and 3 modification of existing GMO authorisation holders' details	Q4 22/23	Q1 23/24
2 Novel food 1 Flavouring 1 Food additive	Q4 22/23	Q1 23/24
12 Feed additives	Q2 23/24	Q3 23/24
34 varying regimes TBC. This will include GMO, Novel Foods, a Food Additive and Feed Additives	Q3 23/24	Q4 23/24
First CBD authorisation(s)	Q4 23/24*	Q1 24/25

* There is a dependency on the planned Home Office legislation on THC limits in consumer products.

Progress of applications is subject to change, for example if new evidence is required from applicants.

Annex C

Improvements made as part of continuous improvement to the Regulated Product service.

Improvements made since Jan 2021 include the following:

- Reviewed FSS's internal risk analysis governance arrangements, and refreshed the terms of reference for the FSS Risk Analysis Forum.
- Completed a review of the risk analysis commitments in the FSS-FSA Memorandum of Understanding.
- Revised the web-layouts to direct applicants to relevant improved guidance, linked on the FSS website as appropriate.
- Developed arrangements for Scottish Government officials to discharge administrative tasks assigned to Scottish Ministers in retained EU law.
- Re-established the Advisory Committee on Animal Feeding Stuffs to assess animal feed additive applications and advise FSA/FSS on related feed matters, which provides greater capacity and capability to meet demand in this busy area.
- Established the Products of Genetic Technologies sub-committee, a new sub-committee of the ACNFP, to assess GM applications and support the development of processes and our scientific understanding on precision bred organisms.
- Worked with FSA to establish a streamlined process to progress multiple applications in batches, reducing duplication of work and enabling larger numbers to be authorised at the same time.