

# FDF Response to FSA's Innovation Plan

## Consultation Questions:

### 1. Is the FSA open to and supportive of business innovation?

FSA officials have often debated that it is for the industry to present and promote the benefits of new ingredients, processes and technologies as the primary role of the FSA is to protect consumers. We fully agree with the need for FSA to put consumers first but we also believe that there is a clear and important role for FSA to play in fostering innovation in food manufacturing and production, within appropriate and robust regulatory frameworks, as consumers will benefit from a well-informed and open dialogue about new solutions derived from the application of science and technology to food production and manufacturing.

We strongly believe that FSA's responsibility needs to extend from the management of present issues to the analysis of future challenges and scenarios and the identification and promotion of technologies able to address future challenges need to be at the core of the FSA remit, alongside and aligned with other government departments such as Defra, BIS and DH.

We were pleased when in January 2014 the FSA Board had an open discussions on innovation which included guest speakers to outline the innovative developments and implementations in the food and drink manufacturing industry and we would like to see more of these initiatives.

It is very positive that Scientific Advisory Committees include representatives with expertise on current research and innovation but there is probably a need for FSA officials to better understand the realities of research and innovation applied to food and drink production and manufacturing.

#### **a) Are we, and those that deliver on our behalf, as open and accessible as we should be to alternative ideas and approaches from business?**

In general, FDF has found FSA officials accessible and open to dialogue on a number of policy and regulatory issues. We have organised a number of site visits and ad hoc meetings with FSA officials to provide a good understanding of processes and day to day challenges in order to encourage a well-informed and pragmatic approach to policy making. When it comes to innovation it can be difficult for companies to engage with FSA officials – and also with their own trade associations - due to the confidentiality of some of the projects they are involved with.

In terms of alternative approaches, FSA seems to often take a very cautious approach, as is the case for the rest of Europe. We would welcome a switch from a traditional view of risk in the context of the precautionary principle to broader considerations. These need to include: the risks of inaction when it comes to the implementation of new science and technologies; and the long-term risk of rejecting new technologies. We believe that the FSA's role in developing well-informed, robust

and manageable policy frameworks should contribute to building consumer trust and allow for new technologies to be tried and tested for the overall benefit of society.

**b) Does our approach adequately support or accommodate innovative approaches businesses – particularly small or emerging businesses - might want to adopt?**

Please see answer above.

**2. Does the FSA understand where innovations in the food and feed sector are coming from?**

**a) Do you think that our approach to identifying and understanding the impact of technological developments and other changes in the food and feed sector is sufficient to inform our thinking?**

The FSA's strength and expertise, as is reasonable, tends to be on regulatory science and it is important to provide opportunities for exposure of FSA officials to cutting edge industrial applications and understanding of implementation of new science and technology in order to develop better informed and timely approaches to regulation.

**3. Does the FSA make the most of innovation in undertaking its regulatory activities?**

**a) Could the FSA, or those acting on our behalf, make better use of available technology?**

Some areas of future development for FSA could be big data, analytical tools, social media; more investment in modelling and tools looking at the implications of inaction and rejection of new technologies; better collaborations with other sectors to explore decision making frameworks to look at complex scenarios (eg pharma, chemical, financial sector, insurance sector).

**27 November 2015**

## The UK Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) is the voice of the UK food and drink manufacturing industry, the largest manufacturing sector in the country. The industry has a turnover of £81.8bn, which is 15.7% of total manufacturing turnover, and Gross Value Added (GVA) of £21.5bn. The industry employs around 400,000 people. Exports of food and non-alcoholic drink have doubled in the last ten years, amounting to a worth of £12.8bn in 2014.

The following Associations actively work with the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FOB	Federation of Bakers
PPA	Potato Processors Association
SMA	Salt Association
SN	Sugar Nutrition UK
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SPA	Soya Protein Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTIA	United Kingdom Tea & Infusions Association Ltd

FDF also runs specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)  
Frozen Food Group  
Ice Cream Committee  
Meat Group  
Organic Group  
Seafood Committee