

UK OFFICIAL FOOD AND FEED LABORATORIES: VISION FOR THE FUTURE

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SUMMARY

1. We have reviewed the capacity, capability and governance of the UK official food and feed laboratory system. This review has identified that we have sufficient laboratory capacity for EU Exit. Looking further ahead, we have identified potential areas for improvement.
2. We provide a vision for how a future UK official food and feed laboratory system could look and highlight some of the next key steps required to develop an improved system.
3. The Board is asked to:
 - **Endorse** our evidence-based vision for a future, more integrated and sustainable UK official food and feed laboratory system; and
 - **Provide** strategic direction on our proposed approach to address the key issues identified and move towards implementation of a new UK official food and feed laboratory system.

INTRODUCTION

4. As the Central Competent Authority under Regulation (EC) 882/2004 and its forthcoming replacement Reg (EU) 2017/625, the FSA is responsible for ensuring the UK has sufficient laboratory capacity and capability to deliver official controls on feed and food safety and standards in order to protect public health – what this paper terms the UK official food and feed laboratory system.
5. The number of official laboratories for food and feed has been declining and this has increased concerns about the resilience of UK official food and feed laboratory service capacity and capability. While this situation has been the subject to a number of reviews over time, a formal assessment of the entire laboratory network has never been conducted by government.
6. At its December 2017 meeting, the FSA Board agreed that a comprehensive review of laboratories was an important priority and that FSA should work with

other government departments in an area that is jointly owned. An update of the review's progress was given in the FSA Chief Executive Report to the Board in March 2019.

7. This concluded that initial laboratory capability and capacity is sufficient for day 1 of EU Exit. Where potential gaps were highlighted in some areas by the review, official control laboratories could resolve these by using their current routes of access to other laboratories in the wider network such as the National Reference Laboratories (NRLs) and other testing laboratories by means of sub-contracting. Under normal enforcement operations these tests are available and will continue to be for Day 1 of EU Exit.
8. Laboratory testing is a front-line service that is critical to national sampling and surveillance programmes. A new UK official food and feed laboratory system should be designed to align with other elements of the surveillance regime within which it sits. Therefore, close links have been established with sampling strategy implementation (Board Paper June 2019), delivery of food standards official controls (Board Paper June 2019) and our strategic surveillance capability (Board paper Dec 2018). Evidence and insights from these activities, and from the externally commissioned review, together with ongoing conversations with other government departments and stakeholders, has allowed us to identify areas for improvement.

CREATING A CASE FOR CHANGE

9. In line with the request from the FSA Board, a comprehensive review of the UK official food and feed laboratory system was undertaken between Sept 2018 and March 2019 in a phased approach¹:
 - The first phase assessed the readiness of UK official control laboratories for EU exit and looked at the capability and capacity of laboratories providing services to the local authorities and UK Government departments. The work, undertaken by Fera Science Ltd, was used to inform the next phase of the review.
 - The second phase assessed the risk in continuing with the current system for testing of official control samples by laboratories and how the current and future risks might be mitigated. This work, which was undertaken by

¹ <https://www.food.gov.uk/research/research-projects/review-of-uk-official-food-and-feed-laboratory-system>

Ernst & Young for the FSA and FSS (who part-funded this phase of the review), was completed in March 2019 and built on the findings from Phase 1. It provided a detailed analysis of the current laboratory network through consultation with experts from across the UK laboratories sector. The review assessed the UK official food and feed laboratory system 'as-is' and carried out a risk assessment of the system to identify mitigating actions to reduce the risks and issues that were identified.

10. Overall the phase 2 review highlighted that the current UK system has the following characteristics:
 - Whilst it has sufficient laboratory capability and capacity, it is sub-optimally organised;
 - It is highly fragmented, with complex funding structures, resulting in a lack of central accountability and causing inefficiency;
 - Is lacking coordination between different Government Bodies (Central Competent Authorities), resulting in variations between the direction given to different parts of the network;
 - There is no national strategy for food/feed sampling and testing;
 - Demonstrates limited intelligence and data sharing;
 - Has an inconsistent approach to collecting and reporting sampling data;
 - Overall there is a gap in the funding and resources required to sustain food and feed sampling and testing.

A VISION FOR THE FUTURE

11. Our goal is to develop a UK official food and feed laboratory system that is sustainable, and which can enable the delivery of robust food and feed controls.
12. The consistent message from all sources of evidence, including the latest and previous reviews, is that the current system needs to change, if we are to achieve this goal.
13. To achieve this, it is essential that any future system has the following characteristics to address the key issues with the current system. These are:
 - Provision of **leadership** to ensure strategic oversight and effective governance and accountability;

- Development of a clear **strategic planning** to determine national testing priorities and align funding options;
- Effective **co-ordination** of laboratory services, to ensure efficient use of resources and effective delivery of testing;
- **Ongoing review** of national testing needs to ensure we have access to the right skills, capabilities and capacity;
- Proper **integration** with other key, national initiatives, especially the FSA Sampling Strategy;
- In terms of timescales, a **long-term commitment** will be required to both implement the required changes and ensure sustainability.

14. To address these, action will be needed in four key areas:

- a) **Improving national co-ordination** through an appropriate and effective cross-government mechanism which would develop a national strategy for sampling, testing and commissioning laboratory services needed to support food chain surveillance activities across the UK.
- b) **Sustaining national capability** by ensuring future investment is targeted to the development and maintenance of laboratory provision and scientific expertise needed to deliver official controls, surveillance and incident response, which can also deal with emerging risks. The FSA currently invests in the network of food and feed National Reference Laboratories (NRLs), many of which are Public Sector Research Establishments, with an annual spend of over £1.2M. Other government departments also invest significantly in NRLs, often within the same organisations.
- c) **Options for long-term resourcing** aimed at addressing market failure, removing barriers to new entrants and widening market access, and ensuring a sustainable demand for these services through defined strategies for sampling, research and surveillance. As recognised in the FSA Sampling Strategy, sampling and testing is a critical part of our wider food surveillance system. The provision of centrally-prioritised, risk-based, statistically-valid, targeted sampling will not only provide invaluable evidence to genuinely drive policy action but can also assist in sustaining laboratory capacity. Any alternative mechanisms for funding sampling and testing will be subject to wider consultation and option analysis and will inform departmental submissions to the Spending Review from 2020.
- d) **Evaluating the role of Public Analyst laboratories.** The decline in the number of official laboratories, in particular UK Public Analyst (PA) ones, is

a sign that the current system is not sustainable. We will identify the UK's future requirements with regard to the designation, competency and assurance of official control laboratories, taking into account that any change to the current approach to the organisation of laboratory services would involve a policy change and potentially a change in legislation. A stakeholder consultation involving official laboratories and local authorities will be an essential part of this process.

NEXT STEPS

15. The FSA will develop an interim model, outlining how a new UK official food and feed laboratory system could operate. This model will set out the issues being addressed and options for addressing each of them.
16. We will co-ordinate discussion and engagement with other Government Departments on the development of the interim model to ensure a coherent, cross-government approach.
17. We will undertake a targeted stakeholder consultation to explore the feasibility of different options presented within the interim model to move towards developing a final working future laboratories model.
18. Reports will be made to the Board in 2020 (timings to be agreed), outlining progress towards the development of the final working model, including reports on OGD engagement and the wider consultation.
19. In order to implement the vision presented here, additional resources will need to be made available; both to deliver the next steps listed above but also to ensure effective alignment with other initiatives that fit within the broader surveillance programme across the FSA.
20. This need for additional resource has been reflected with the FSA's SR19 submission, presented to HMT at the end of August. Given the multi-year nature of this initiative, further consideration will need to be made in subsequent spending reviews.

CONCLUSIONS

21. Given the issues identified within the current UK official food and feed laboratory system, the Board is asked to:
- **Endorse** our evidence-based vision for a future, more integrated and sustainable UK official food and feed laboratory system; and
 - **Provide** strategic direction on our proposed approach to address the key issues identified and move towards implementation of a new UK official food and feed laboratory system.