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8th February 2012  

Dear Sir / Madam,  

Food Standards Agency Consultation on Removal of Post-Chernobyl Sheep Controls  

Thank you for inviting the Farmers’ Union of Wales to contribute to the above consultation. Following an internal consultation with its twelve County Branches, the Union submits the following comments for your consideration.  

**General Comments**  

Members generally agreed that the scientific analyses conducted by the FSA were appropriate in determining the level of risk involved in removing post-Chernobyl sheep controls. The Union recognises that the FSA preferred option – **Option 2**: Removal of all post-Chernobyl controls and associated regulation on sheep farming in the UK – has considered and evaluated the potential risk to consumer health and that the risk perceived is now negligible.  

However, despite the reported positive scientific risk assessment, members believed it imperative that consideration be offered to the impact of removing controls on the consumer perception of UK and Welsh lamb. Welsh lamb is currently in a strong position within the global marketplace, and since being granted Protected Geographical Indicator (PGI) status in July 2003 has been formally recognised in terms of its origin and quality at a domestic and European level. Adverse publicity could jeopardise the overall perception of Welsh lamb, thereby leading to a decline in the production and consumption of this high quality product.  

Mishandled or inappropriate information dissemination could lead to a reduction in consumer confidence if consumers fail to understand the evidentiary support for removal of controls and therefore perceive such produce to be unsafe. This is especially pertinent given that the majority of consumers presently have little awareness of the existence of post-Chernobyl restrictions on UK farms. Furthermore, the difference in the perception of consumers to terminology such as ‘low’ versus ‘no’ risk must be considered and evaluated prior to any information dissemination.  

Should the FSA opt to remove all post-Chernobyl controls and associated regulation, the main priority must be to ensure the existence of an effective communication plan. When and if media interest in this issue arises, it is essential that the resultant FSA communication is clear, consistent, in
an appropriate format, and validated with robust scientific evidence, with the latter being disseminated in a format which is easily accessible and easily understood by the average UK consumer. The Union believes that the FSA should aim to monitor the media coverage given to this issue and should be prepared to counteract any negative or erroneous publicity immediately. The FSA should also be prepared to take robust action, if necessary via the Press Complaints Commission, in the event that the science relating to the removal of controls is misrepresented in the media.

The Union believes that there may also be merit in the FSA reviewing the communications issued when post-Chernobyl sheep restrictions were removed in Scotland.

Members believed that any financial drivers, such as the reported £350,000 cost savings, must be secondary to the validity of removing all controls. Any dissemination of information to the consumer should primarily focus on the scientific evidence supporting a negligible risk to human health. Reports on cost savings may be misconstrued as the main driver for change and could overshadow the validity of the scientific evidence.

The Union notes the format of the present consultation and the associated questions which require respondents to produce evidence to validate, support or amend the FSA Impact Assessments as provided. In order to more fully ascertain the effects of the outlined proposals, the FUW would have preferred to see a consultation appropriate for the collection of information from affected farmers.

**Specific Consultation Questions**

**Q1:** Do you have any evidence that would alter the assessment that the risk to consumers is very low and that removing controls will not compromise consumer safety?

The FUW does not possess any evidence that would alter the consumer health risk assessment as provided by the FSA.

**Q2:** Do you agree with the estimates for the time farmers have to make themselves available during Mark and Release inspections?

Members responding to this section agreed that, as outlined in the relevant section of the impact assessment, 2 hours per 100 sheep monitored and 1.5 hours for every 100 sheep not monitored but inspected were appropriate time estimates.

**Q3:** Please provide evidence of any financial implications that the removal of controls, and hence ceasing of headage payments, will have on farmers currently under restriction?

Under the present controls, farmers under restriction receive compensation amounting to £1.30 per head. This compensation is offered in recognition of the costs incurred when gathering and holding sheep for monitoring under the FSA ‘mark and release scheme’. The Union notes that approximately 250,000 sheep are monitored or inspected in Wales. Lifting restrictions will therefore lead to a Welsh-specific loss of £325,000 per annum.

However, members responding to this section of the consultation believed that the reduction in restrictions and the concomitant increase in the ability of producers to take advantage of market price increases would offset such losses, provided adverse publicity did not result in an, albeit scientifically unfounded, fall in consumer confidence.
Q4: Do you consider that there are any further costs, benefits or other implications to the farming, meat processing and retail industry that would result from the proposal to remove all remaining controls which have not been considered in the Impact Assessment? If so, please provide evidence to support your response.

The Union notes that consumer confidence was identified as a key factor in the discussions associated with the present control measures (Stakeholder Discussions, Part II, pg 38). Although difficult to definitively quantify, the majority of members believed that inappropriate information dissemination could reduce consumer confidence in Welsh lamb and could lead to a decline in consumption (please see the section entitled ‘General Comments’ for further information).

Q5: Do you agree with the assessment of costs and benefits outlined in the Impact Assessment? If you disagree, please provide evidence to support your response.

The FUW has no additional evidence to provide on the relative costs and benefits outlined in the Impact Assessment. However, the Union would reiterate that the removal of post-Chernobyl sheep controls, and any subsequent information dissemination on this matter, must recognise any potentially detrimental impacts on consumer perception.

I trust that due consideration will be given to the preceding information.

Yours

Dr Hazel Wright
Senior Policy Officer