
MINUTES OF THE FSA BOARD MEETING HELD ON 28 JANUARY 2015 AT ST DAVID'S HOTEL, CARDIFF FROM 09:00-12:50

Present:

Tim Bennett, Chair; Henrietta Campbell, Deputy Chair; Liz Breckenridge; Ram Gidoomal; Jeff Halliwell; Heather Peck; Roland Salmon; Jim Smart; Jim Wildgoose; Paul Wiles

Officials attending:

Catherine Brown, FSA Chief Executive
Jason Feeney, FSA Chief Operating Officer
Steve Wearne, FSA Director of Policy
Professor Guy Poppy, FSA Chief Scientific Adviser (CSA)
Rod Ainsworth, FSA Director of Regulatory and Legal Strategy
Elsbeth MacDonald, FSA Head of Regulatory and International Unit
Alice Biggins, FSA Regulatory Strategy Manager
John Barnes, FSA Head of Local Delivery
Will Creswell, FSA Head of Consumer Protection
Geoff Ogle, Director FSA Scotland
Nina Purcell, Director FSA Wales
Chris Hitchen, FSA Director Finance and Strategic Planning
David Lowe, FSA (UK) Transition Manager New Scottish Food Body
Rebecca Merritt, FSA Head of Private Office

WELCOME AND ANNOUNCEMENTS

1. The Chair welcomed everyone to the meeting in Cardiff and advised that interpretation from Welsh into English would be available throughout the meeting.
2. The Chair welcomed Jason Feeney, who had replaced Andrew Rhodes as FSA Chief Operating Officer, to his first Board meeting.
3. The Chair reminded all Board members to declare any relevant conflicts of interest before discussions.
4. No items for Any Other Business were raised.

MINUTES OF MEETING HELD ON 5 NOVEMBER 2014 (FSA 15/01/01)

5. The minutes were accepted as an accurate record of the 5 November 2014 meeting, subject to the removal of the word *not* in paragraph 11.

ACTION: Board Secretariat

ACTIONS ARISING (FSA 15/01/02)

6. There were no comments on the Actions Arising and they were accepted with no changes.

CHAIR'S REPORT

7. The Chair advised the Board of the list that had been published of the many useful engagements he had attended since the last Board meeting. He drew particular attention to his attendance with Steve Wearne, FSA Director of Policy, six weeks ago at the first meeting of the joint Ministerial Group on Food Integrity and Food Crime set up in line with the recommendations in the Elliott Review.

CHIEF EXECUTIVE'S REPORT (FSA 15/01/03)

8. Catherine Brown drew particular attention to the section on FSA People. Catherine said that while the results of the Civil Service People Survey had shown an improvement in the FSA's overall engagement score, the target was to achieve the civil service high performing benchmark in the next two years. She said it was critical to delivery of the strategic plan that our people felt empowered to contribute as they were key to the Agency delivering benefits for consumers.

The Board commented that the increase in the engagement score was particularly of note given that more than half of FSA staff worked in stressful and sometimes isolated front line jobs. In answer to a question Catherine agreed that engagement was not a proxy for innovation but suggested that it was a pre-requisite; our Continuous Improvement work and the Icing on the Cake scheme were both examples of how the FSA was building capability to increase people's confidence to suggest changes and innovations.

9. A Board member asked if there was increased awareness in the Food Crime Unit (FCU) about the risk to food authenticity, for example in fish, due to the pressure on supermarket profit margins. Catherine reassured the Board that the FCU was well aware of how economic pressures could impact the food chain to the detriment of consumers; and that the issue of how to identify specific risks arising and give them the attention they deserved was also considered in discussions on the strategic plan.
10. A Board member also asked for clarification on the European Parliament vote on a ban on GM crop cultivation in Member States. Steve Wearne explained that there had been a clear majority in the Parliament in favour of the Commission's proposal to allow the cultivation of GM crops. The proposal allows Member States to opt out of an EU authorisation for cultivation of a GM crop by either asking the applicant company to omit the Member State from the scope of the

application, or by implementing a national ban on grounds other than food safety once it has received EU approval. Once the new Directive had been through the administrative processes, the Department for Environment, Food and Rural Affairs (Defra) would lead on transposing it into UK regulations. Steve said the Commission's proposal did not specify the meaning of 'Member State' in this context; he noted the current convention in the UK that GM crop cultivation is an area of devolved competence.

11. The Board commended the communications work done around the publication of the campylobacter results in November 2014.

A Board member asked how much sharing of results on levels of campylobacter to enable learning from successful campylobacter reduction initiatives was being done by industry. Catherine said everyone was sharing more than they used to but some were sharing more than others. This was the focus of the Acting on Campylobacter Together Board, chaired by Richard Macdonald that would be bringing together senior representatives of retailers and processors.

Steve reassured the Board that the FSA was working with Public Health England (PHE) and others to address the environmental, non-food element of campylobacter but reiterated that the available models suggested that hitting the FSA industry joint target for reducing campylobacter in poultry would reduce campylobacteriosis as a human disease by up to 30% and that our current focus on Campylobacter in chicken was supported across government as the most material way of reducing the human impact of campylobacteriosis.

12. During a discussion on prosecutions, the Board highlighted that some food businesses also thought that fines levied were trivial and insignificant. Catherine said we were continuing to push for more significant penalties likely to act as deterrents through the Sentencing Council Review, and as part of the Regulatory Strategy we were also intending to place greater emphasis on getting the message out to potentially non-compliant businesses that those breaching food regulations were likely to get caught and punished.
13. The Board asked if the review of the Food Hygiene Ratings Scheme (FHRS) in Wales would investigate if there was a corresponding decrease in foodborne disease in Wales and it was agreed that although this would be difficult to establish given the complex nature of the system, it would be worth considering whether it was possible. It was also noted that enabling consumers to choose to eat in hygienic establishments had value in itself, even if no link to reductions in food borne disease could be conclusively demonstrated.

14. A Board member asked for further information on the incidents involving *E.coli* O157 infections potentially linked to the consumption of raw drinking milk to support the Board's further deliberations on this issue.
15. The Chair confirmed that both the FHRS and raw drinking milk were on the agenda for the next Board meeting in March and the points raised on these topics by the Board would be addressed further at that time.

DEVELOPING THE FUTURE REGULATORY STRATEGY (FSA 15/01/04)

16. The Chair welcomed Rod Ainsworth, FSA Director of Regulatory and Legal Strategy, Elspeth MacDonald, FSA Head of Regulatory and International Unit, and Alice Biggins, FSA Regulatory Strategy Manager to the table.
17. Rod said this paper had drawn on the external facing work undertaken in developing the FSA Strategy to 2020 and sought regulatory outcomes in the widest sense on behalf of consumers. If the Board agreed the principles as outlined, these would inform and underpin the work to follow.
18. Elspeth identified that the FSA Strategy to 2020 told us a lot was expected to change in the future of the food system and we did not know how fast changes would happen or exactly what they would be. We therefore needed to ensure that our future approach to our regulatory role could be flexible to a changing landscape, enabling us to react to different circumstances.
19. Elspeth explained that the team started this work by asking themselves what they wanted the future to look like. To do this, they created 'a postcard from the future', describing outcomes that align with the Strategy's aspirations, particularly regarding consumers' right to be protected and their right to make choices knowing the facts.
20. Some of the outcomes that their 'postcard from the future' described were:
 - Consumers feel confident about the safety and authenticity of the food they buy, and FSA has access to accurate and up to date information from which we know that their confidence is justified.
 - There are a number of different ways in which businesses can demonstrate that they are producing safe food that is what it says it is, and our focus is on these outcomes, not on prescribed inputs.
 - We do not rely on a single source of information about business performance. We have robust and secure information flows between industry and regulators that reduce our reliance on official inspections and checks. We make greater use of real time data, and our role focuses on challenge and verification and

ensuring that those who have sought to mislead or failed to meet their obligations are properly penalised.

- We use incentives - and disincentives - that align consumers' interests with businesses' interests – recognising and rewarding good performance and dealing swiftly and effectively with poor performance.
- A broad range of regulatory interventions are available, targeted at businesses either unable to provide us with the assurances we require, or that fail to meet agreed outcomes.
- Penalties for failing to meet food law requirements are proportionate to the potential harm caused, and prevent consistently bad businesses from trading.
- Food law is truly risk-based and the costs of compliance do not add unwarranted burdens to consumers, businesses or regulators.
- And as a consequence, consumers think of the FSA as 'on their side' in relation to food.

21. These were ambitious aspirations, and ones that were likely to require significant change. Whilst there were some things we could do now, this would not all be easy, nor delivered overnight.
22. Elspeth said if the Board agreed the framework of principles described in this paper, they would move this work forward through further engagement and discussion with stakeholders to inform the prioritising and planning of the relevant projects and work streams to start to move towards the 'postcard from the future'.
23. Alice Biggins said that paragraph 4.6 of the paper outlined some work that was already underway with regard to some things that we could do now.
24. Alice explained that the team was already progressing work on sanctions, through working with the Sentencing Council, which was consulting on proposals for sanctions that were dissuasive and proportionate. The team would align the outcomes of this consultation with its work on complementary and alternative sanctions, ensuring they were taking a holistic approach, allowing them to develop a suite of more effective sanctions than the current framework allowed.
25. The team had undertaken analysis on whether we were fully utilising all the flexibilities available in current food law in how official controls were carried out. There was less flexibility in relation to foods of animal origin, including meat, where EU legislation was much more prescriptive. But there may be significant scope in other areas to develop new approaches to the frequency and nature of official controls, and this needed to be developed further, in collaboration with a wide range of stakeholders.

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26. Alice said these were examples of work that the team would bring back to the Board for discussion and decision making in due course.
 27. The team were also talking to other regulators in other sectors and countries to share experiences and thinking on how to develop regulatory approaches that were future-proofed in terms of sustainability, and that would deliver the outcomes we sought for consumers.
 28. A Board member noted that pursuing risk-based incentives was the right way forward and that we would benefit from exploiting technology to avoid creating methods even more unwieldy than inspections to collect data.
 29. Rod agreed that the need to exploit technology to collect and store useful data underlined the Regulatory Strategy's close link with the FSA's Information Strategy. Rod also agreed that the FSA needed to do more to keep up with the innovative methods local authorities (LAs) were adopting to deliver their responsibilities. Elspeth agreed that we would have to look at the costs and benefits of what we wanted to try to assess their impact and avoid any unintended consequences.
 30. The Chair of SFAC reported that the Committee welcomed the Regulatory Strategy. He said the concept of 'confidence in management' was important and while acknowledging the complexity of work in this area felt it was well worth taking forward.
 31. Professor Guy Poppy said analysis of Big Data could optimise surveillance by affording us the opportunity to detect unusual patterns and so create early warning signals for the need for intervention.
 32. A Board Member also said that in order to encourage not only good but outstanding practice, he supported the idea of a continuum to recognise food businesses that achieved more than what the law required of them. Rod agreed that a continuum of praise also lent strength to criticism.
 33. The Chair of the Northern Ireland Food Advisory Committee (NIFAC) reported that the Committee welcomed the Regulatory Strategy and how it recognised Devolution and the diversity of regulation across the UK. Elspeth agreed that the Regulatory Strategy was not a one size fits all approach to regulation and that there should be opportunities to develop approaches appropriate to national circumstances.
 34. The NIFAC Chair reported that the Committee was pleased that the Regulatory Strategy was not softening our approach to regulation rather suggesting different

and better ways to regulate. The Regulatory Strategy was innovative but it must reassure consumers that where there was a risk to consumers we would not hesitate to use the full force of the law to protect them.

35. Catherine Brown said the FSA was not just a regulator; we existed to protect consumers' interests in relation to food and regulation was only one way in which we did that. She pointed out that it would be incorrect to consider traditional regulatory interventions as "harder" than more innovative interventions such as the publication of the league table on levels of campylobacter in poultry, which was driving change in the interests of consumers faster and more effectively than a traditional regulatory intervention could have.
36. A Board member said a risk-based regulatory approach would mean there would be areas where LAs, rather than the FSA, would need to be tougher and we should be explicit in saying that to support LAs to be tougher, at times, the FSA would have to go beyond collaborating with them to intervening or providing financial assistance.
37. A Board member pointed out that there are factors beyond legal compliance and economic incentives that encourage compliance and Alice agreed that when looking at reasons for compliance among businesses, fear of sanctions came low down on the list and work was being done to look at the other factors, taking account of the thinking being developed in other government departments.
38. In response to comments from the Board, Elspeth agreed there was a lot of auditing going on and when this auditing was focussed on the right things, then we should not look to repeat it. Also, she assured the Board that we were looking beyond the UK and trying to learn from other countries on issues such as through European work on certification schemes and third party assurance.
39. Rod agreed with the Board that there were risks to the FSA's independence by consciously bringing funding into the regulatory model but the FSA needed the resources to do what it needed to do in the interests of consumers. Rod also agreed that in the future it was possible that the cost of the regulatory regime could be borne by those it regulated, as it was in other industries, but such a funding model would have to be accepted by the food businesses, consumers and stakeholders and would need to be clear about how the independence of the FSA was protected.
40. Steve Wearne said that the development of a broad range of regulatory tools should not detract from the importance of leading a process of regulatory reform in order to improve the basic fundamentals of food law. We needed to look at current UK and EU legislation and identify that which was vital to consumer

protection and that from which it was difficult to identify the consumer benefit – making clear our expectations that food businesses should comply with the former, and using our influence to reduce and eliminate the latter. In parallel, we should identify the scope for new legislation that had the potential to improve consumer protection, for example the approval of surface washes and introduction of a process hygiene criterion to help reduce campylobacter on poultry.

41. The Chair of WFAC said the Committee endorsed the Regulatory Strategy and that it would become clear in the detail which was to follow exactly how a balance between regulation and other approaches would be achieved.
42. The Chair summed up the discussion saying:
 - The Board agreed with the direction for the future regulatory approach as outlined at paragraph 1.6 of the paper
 - The focus needed to be on achieving outcomes for consumers in terms of food and we should employ everything we had at our disposal to do that
 - The devolved nature of the UK meant that we should not lose pace by waiting for others, rather we could go faster by doing in one area what we could not do in others
 - Our partnership with LAs, industry and others needed to start from the beginning and not just at consultation stage
 - We needed to be more confident in working to change international legislation to the benefit of our consumers even while acknowledging this could be a slow and challenging process
 - We needed to be mindful of our independence and that nothing must be allowed to compromise our focus on consumers
 - We needed to communicate our excitement over this new approach to regulation to consumers to bring them along with us on this journey of change

BURGERS SERVED RARE IN FOOD SERVICE OUTLETS – AN APPLICATION OF THE FRAMEWORK FOR OUR APPROACH TO “RISKY” FOODS (FSA 15/01/05)

43. The Chair welcomed John Barnes, FSA Head of Local Delivery, to the table and asked Steve Wearne to introduce the paper.
44. Steve said in preparing this paper, they had applied the framework for the approach to risky foods which the Board agreed in November; the annex to the paper summarised the framework, amended to reflect the Board’s discussion. There were also clear links to the consumer protection theme in the FSA Strategy to 2020, and to the preceding discussion on the Regulatory Strategy in

terms of applying a wider range of tools and interventions in order to deliver a risk-based regulatory approach.

45. Steve fed back to the Board that the response from industry and enforcement communities to the framework had been overwhelmingly positive.
46. Steve said he wanted to be clear about the scope of this paper. It was not about our advice to consumers about cooking of burgers and similar products in the home, which remained that these should be cooked thoroughly until no pink remains, the juices run clear, and the food is piping hot all the way through.
47. It was also not about our advice to food businesses and to local authority enforcement about standard burgers prepared in the generality of food service outlets, which continued to be based on the long-standing advice from the Advisory Committee on the Microbiological Safety of Foods (ACMSF) that minced products such as burgers should be cooked thoroughly, sufficient to achieve a one million-fold (or 6-log) reduction in bacterial load.
48. This remained an important public health safeguard underlined by the outbreak of VTEC in February 2014, affecting 22 people and linked to the consumption of undercooked burgers served at the Big Grill outlet in the SSE Hydro venue in Glasgow.
49. This paper instead related to proportionate control of the growing dining phenomenon of gourmet burger restaurants which served burgers less than well-done. These outlets typically had food safety management plans which covered, for example, sourcing of beef, testing and preparation which were able to achieve the equivalent of a ten thousand-fold (or 4-log) reduction in bacterial load without thorough cooking.
50. As the paper set out, the application to these businesses of the requirement to cook burgers thoroughly continued to be questioned and challenged by food businesses, by local authorities, and by the domestic courts. Steve said the current position, characterised by a lack of clarity on proportionate enforcement relating to such processes, was untenable, and did not in practice lead to effective consumer protection. This paper therefore brought the issue of burgers served rare in food service outlets to the Board for early discussion using the framework, with the aim of providing clarity for both industry and local authority enforcement.
51. Steve said we did not, at this point, have sufficient information to bring a complete assessment to the Board for a final view. The quantitative risk assessment modelling suggested that the risk from a combination of preparation

and cooking that reduced bacterial load by 4-log, might not be much greater in relative terms than the risks associated with a consumer cooking a burger in the home to what they judged to be well done, but this was not a definitive view.

52. Further refinement of this work had been commissioned and was due to be completed in March 2015. This should provide us with the basis for the Executive to ask specific risk assessment questions to ACMSF in order to inform further Board discussion of an acceptable level of risk from these products.
53. In parallel, Steve proposed to undertake further deliberative work with consumers, and further engagement with enforcement and industry stakeholders on the combination of additional controls that would reduce and maintain risk to an acceptable level.
54. If the Board was content with these proposals, Steve would bring a further paper for discussion when the work outlined was complete to allow the Board to consider whether they wished to change their view on the acceptability of burgers served rare in food service outlets in some circumstances, and the controls necessary to manage risks to an acceptable level.
55. A Board member said he had an interest in this topic in so far as he had previously been involved in investigating outbreaks of *E coli* O157. He said eating rare burgers was a form of Russian roulette for which the odds were well known. 19 infractions per 100 000 servings may seem low but the rate of the illness was 1-2 per 100 000 in England and Wales and 5 per 100 000 in Scotland. Two-thirds of those affected were very ill and half of those end up in hospital; 10% of those need dialysis. There was a vast body of scientific evidence on *E coli* O157 in existence so we knew what we were dealing with. He said we should not be swayed by food fashion rather we should put food safety first above other interests.
56. He recognised that LAs were waiting for a lead in this area from the FSA; and one outbreak of *E coli* O157 could damage the reputation of the Agency if there was any lack of clarity. Given this and the advice of the ACMSF we should not tolerate the practice of serving rare burgers while waiting for the further modelling work to be done.
57. Another Board member had been involved in investigating the *E coli* O157 outbreak in Scotland in the 1990s, which had not been due to rare burgers, but during which 20 people had died.
58. He pointed to the fact that in accordance with the EU Regulation, courts could give, and indeed had given in the case of Davy, the view that hazards identified

had been "... reduced to acceptable levels". This meant that the extreme view of eliminating all risk was not supported by the legislation. He asked if anything could be done to reduce the contamination of *E coli* O157 on raw meat before it was cooked and served rare. He suggested that given the unhelpful wording in the legislation and the severity of *E coli* O157, if guidance were issued to those serving rare burgers specifying what else they needed to do to the raw material apart from cooking it, this would get the courts' attention and in turn get industry's buy-in.

59. The Chair said taking a farm to fork approach, we should look again at what could be done further up the supply chain. Consumers were exercising their right to make choices in this area so the FSA had a responsibility to protect them by giving them the necessary information.
60. John Barnes clarified that we had to differentiate between establishments which had specific controls and upstream measures in place, and outlets trying to emulate those establishments while lacking the controls. The FSA needed to give LAs clear advice; some restaurant chains involved had clear procedures in place and might invest significantly in resisting LAs in the courts; and there were others which did not have procedures in place which needed to receive a clear message.
61. In terms of quantifying the issue Steve said there were half a dozen or so multinational organisations with numerous outlets throughout the country and over 100 independent caterers selling rare burgers; of the hundreds of millions of burgers served each year in restaurants and similar outlets in the UK, rare burgers would represent several million of them.
62. Steve said as there was a risk from burgers cooked in the home, this could not be about risk elimination rather it was for the Board to decide on the acceptability of the risk and then to be advised on the controls available that would maintain risks within acceptable limits. The controls ranged, for example, from a code of practice regarding sourcing, preparation and labelling on menus, to licencing of businesses.
63. A Board member said she was concerned about the increased risk of *E coli* O157 and the impact on the NHS and would prefer to reduce the risk as much as possible. She was also concerned that LAs were in limbo over this issue. There was no evidence to contradict the advice of the ACMSF and in light of increasing demand, the FSA needed to communicate to the public that there was a risk of *E coli* O157 from eating rare burgers.
64. There was discussion and agreement on the importance of doing further consumer research on the reasons for consumers choosing to eat rare burgers.

65. Catherine clarified that at this stage there was no change to the FSA's position and consumer advice on eating undercooked burgers. She suggested however that given that large numbers of burgers were being consumed undercooked there was an urgent need to draw the attention of consumers to the risks involved, particularly to vulnerable consumers who may be more open to advice on this point.
66. A Board member said that in applying the framework there were parallels to raw drinking milk as both products were intrinsically harmful to consumers and so we should be consistent in application of the framework where risks were comparable. Having observed a chef prepare meat for serving raw, it was clear to her that consumers could not prepare undercooked burgers at home to the same level of risk reduction as in restaurants with safety measures in place.
67. There was some discussion of how the Board could better support LAs to address enforcement challenges in the light of the current situation and effectively protect consumers.
68. John Barnes said the Food Hygiene Focus Group had already been discussing advice with LAs which it could put out fairly quickly to clarify for LAs that they were only to take enforcement action against those establishments where there was no specific Hazard Analysis and Critical Control Points (HACCP) plan in place which had passed challenge testing; and that the FSA would support any LAs challenged in court over this.
69. The Board were clear that they remained strongly of the view that consumers should avoid eating undercooked burgers, but were also anxious to give more useful support to LAs on how to target their enforcement resources. On this basis Catherine suggested that LAs be advised to focus their enforcement efforts on businesses with no robust, tested, HACCP plan in place which demonstrated a 4 log reduction in bacterial load. Such a HACCP plan would need to include the critical step of consumer advice to draw the consumer's attention to the risk of eating rare burgers, particularly for vulnerable groups of consumers. In those cases where businesses had a robust HACCP plan in place and gave clear consumer advice on the risk, it was considered that the likelihood of failing to achieve a positive outcome in any court case meant that it would not be in the public interest to seek to take enforcement action through the courts. However, in cases where no HACCP plan and consumer advice was in place, LAs should take robust enforcement action and the FSA should stand ready to support them.
70. Catherine said we would renew our advice to consumers not to eat rare burgers. By giving LAs differentiated advice we were helping LAs use their constrained resources to target those establishments without a plan against which they had more chance of getting a conviction.

71. Steve agreed to keep the Board updated on progress in getting this advice out to LAs as quickly as possible and on progress with the further modelling work which in turn would inform a decision by the Board on whether, in relation to burgers served other than well-done by food businesses with a robust and validated Hazard Analysis and Critical Control Points (HACCP) plan which demonstrated a 4 log reduction in bacterial load on challenge testing, the level of consumer risk was acceptable.

ACTION: Director of Policy

72. The Chair concluded that the Board supported the approach as outlined by Catherine to take urgent action to support LAs and to communicate the risk to consumers by reiterating the FSA's advice not to eat burgers served rare due to the risk of *E coli* O157.

PROGRESS UPDATE – IMPLEMENTING THE RECOMMENDATIONS OF POST-HORSEMEAT REVIEWS (FSA 15/01/06)

73. The Chair welcomed Will Creswell, FSA Head of Consumer Protection, and Geoff Ogle, Director FSA Scotland, to the table and invited Steve Wearne to introduce the paper.
74. Steve said the Board was provided with information at its November meeting, which gave an assessment of how the FSA had improved its capability, processes and networks since the horsemeat incident in 2013, with a view to improving our ability to collect, analyse and act on intelligence regarding food fraud, and also our approaches to managing material food incidents.
75. This paper expanded on the information provided in that paper, and met the actions recorded at paragraphs 84 and 98 of the minutes of the November meeting, in that it set out in an annex our progress in acting on the recommendations that were addressed to the FSA from each of the reviews of the horsemeat incident commissioned by various arms of Government.
76. Steve said the Board were being asked to note this progress, and to agree to remit the checking of future progress against these recommendations to the Chief Executive, who would report to the Board on an exception basis as part of her written reports to open Board meetings.
77. The Chair drew the Board's attention to the fact that the recommendations covered in the paper were only those which fell to the FSA; actions for other Government Departments were reported on at the Joint Ministerial Group which he attended.

78. A Board member asked for an update on recommendations which fell to other Government Departments but to which the FSA had a contribution to make. Steve referred to the annex of the Government Response to the Elliott Review which could be found on the gov.uk website.
- As the Central Competent Authority for food in the UK, the FSA had a statutory obligation to ensure sufficient capacity and capability in official control laboratories in the UK. Steve said the Department of Health (DH) and Public Health England (PHE) were making progress on this action with our support.
 - The Department for Business, Innovation and Skills (BIS) and local authorities had delivered on making effective use of information sharing mechanisms at the local authority level through the Primary Authority Partnership Scheme. The FSA's Regulatory Strategy sought to further reinforce better intelligence sharing between the food industry and government.
 - The FSA along with Defra were facilitating industry's development of options for setting up their own 'safe haven' for information sharing. Steve said the Food and Drink Federation (FDF) were doing exemplary work in this area. 'Safe havens' should however be seen as one of a number of routes through which the FSA received information and intelligence, alongside bilateral discussions with retailers and producers and whistle blowing in the food industry, which had proven very fruitful in actionable intelligence for the FSA over the last 18 months.
79. The Board agreed this paper gave a helpful summary of the many recommendations from all the reports and commended the FSA for all it had achieved under pressure since the horsemeat incident.
80. A Board member suggested that after the elections may be an appropriate time for the Board to consider overall progress with improvements to the FSA's capabilities in incident prevention and response and that might be a good time to consider whether to remit updates on progress on the recommendations of specific reviews to the Chief Executive's report.
81. In response to a question from a Board member about the role of the Board during incidents, Catherine said feedback from the Board on how they had been kept informed during the horsemeat incident had been good. The Board did not have a decision making role in managing live incidents, but it was recognised that it was important for them to be kept up to date with progress as far as possible with high profile issues.

82. A Board member asked for more information about recommendations 5 and 16 which were both rated amber to understand if some ambers were more of a concern than others. With regard to recommendation 5, Will Creswell explained that industry was not making as much progress on setting up its own 'safe haven' for information sharing as the FSA would like. The FSA was continuing to push for progress on this and had attended a meeting held by the FDF last week on the issue. Will hoped this action would move to green in the coming months.
83. As for recommendation 16, Will said it would remain amber until the end of March and the conclusion of our exercise programme which was testing our resilience in handling food incidents.
84. Geoff Ogle said that after their establishment, it would be for Food Standards Scotland to assume jurisdiction for the Scudamore Report, although there would continue to be benefit in close working as some of the recommendations also applied to the rest of the UK .
85. In concluding the Chair said in the short term the Board would prefer to continue to receive a separate paper updating them on progress against the amber and red recommendations rather than receiving the information through the Chief Executive's Report.
86. The Board would also like an update on progress with the Food Crime Unit to be added to the forward agenda plan for a future Board meeting.

ACTION: Board Secretary

UPDATE ON EUROPEAN COMMISSION PROPOSALS TO REVISE THE TSE REGULATIONS – ORAL REPORT

87. Roland Salmon declared an interest as a member of the Advisory Committee on Dangerous Pathogens (ACDP) and Chair of its Transmissible Spongiform Encephalopathies' Risk Management Subgroup. The Chair said that given the nature of the discussion there was no reason to exclude Roland from the discussion.
88. The Chair invited Steve Wearne to present this oral report to the Board. The European Commission had proposed amendments to Annex V of the TSE Regulations (999/2001) which would relax current controls in two areas:
 - First, it would amend the list of specified risk material (SRM) in bovines, which currently included all intestines from duodenum to rectum, which the

proposal would limit to the last four metres of the small intestines plus the caecum. This proposal was based on modelling studies by Animal and Plant Health Agency (APHA) here in the UK and by European Food Safety Authority (EFSA) which suggested that removal of the last four metres of intestine would remove 90% of the total infectivity associated with intestine and mesentery in cattle up to 36 months of age.

- Second, it would repeal the requirement for EU Member States with negligible BSE risk status to remove certain SRM. This would have the result of bringing SRM rules more into line with the World Health Organisation for Animal Health requirements for third countries.

89. The Commission first mooted these proposals at Standing Committee in October 2014, and moved swiftly to a vote on 16 December on the first part of these proposals. There was a qualified majority in favour, and this proposal was now subject to ‘regulatory procedure with scrutiny’. The change would come into effect 20 days after the publication of amending legislation in the Official Journal of the European Union.
90. A vote on the second part of the proposals was yet to be taken, and further discussions were likely at a Standing Committee meeting on 17 February. The situation remained fluid, and we had received further proposals on 27 January from the Commission which aimed to reach a compromise with Member States who were opposed to the second part of their original proposal.
91. The UK position in general relating to TSE controls was to support a risk-based and proportionate approach that minimised any unnecessary burdens, with any changes to controls reflecting the decreasing risk posed by BSE, and being based on sound science and robust risk assessment.
92. The UK had abstained in votes called by the Commission on the proposals currently on the table. We made the following statement for the minutes recording the 16 December vote:
- “Any proposed changes to BSE controls must be based on sound science and robust risk assessment. It is our view that there has not been sufficient time to consult fully with consumers and all relevant interests. The UK has expressed its preference to wait until further epidemiological evidence can be presented as atypical BSE remains a concern.”
93. The FSA’s preferred approach to the domestic consideration of changes to TSE controls had not been changed by the Commission’s proposals. We would seek expert advice on proposed changes, and bring them to the Board for discussion

so that the Board might advise Ministers as the UK negotiating line was developed. The fact that we had not followed this approach on this occasion was due to the haste with which the Commission had been trying to gain agreement from Member States on its proposals.

94. The Chair then invited Roland Salmon to speak as Chair of the Transmissible Spongiform Encephalopathies' Risk Management Subgroup. Roland said due to the haste with which these changes were being pursued an ad hoc meeting of the Subgroup had been called for 12 February. The scientists from the APHA who had been involved in the modelling would be present and the hope was to be able to give direction to the FSA officials attending the Standing Committee on 17 February. However, Roland said scientists were inherently cautious so it was unlikely that there would be any ringing endorsement of the changes. The Subgroup would identify where the risks lay and then it would be for the others to manage them.
95. Steve confirmed for the Board that the changes meant that the 18 Member States with negligible risk status would operate with a different definition of SRM which would then enable the same parts of the animal to enter the UK food chain as currently did from low risk third countries which had the same definition of SRM.
96. The Chair concluded this report had been important in bringing this issue into the public domain. The Board would have preferred these changes not to have been progressed by the Commission at such speed but the Agency had matters in hand, was getting urgent advice from the Advisory Committee Subgroup and would continue to press for sound evidence to underpin any changes. He also drew attention to the importance of feed controls and surveillance as the other two critical components of the control system, alongside SRM controls, and pointed out that changes to SRM controls made it all the more important that those other two controls continued to be appropriately resourced and operate effectively.

**REPORT FROM THE CHAIR OF THE WELSH FOOD ADVISORY COMMITTEE
(WFAC) FSA 15/01/07**

97. The Chair invited Roland Salmon, Chair of WFAC to present his report to the Board.
98. Roland said it was his first report since being appointed in June 2013 as Chair of WFAC and the Board member for Wales and pulled out some of the key areas outlined in the report. He emphasised the openness of WFAC meetings and the conscientious way that the committee reviewed papers in advance of Board discussions and made their inputs to Board discussions.

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99. The membership of the Committee was quite diverse. There were seven members including Roland. Roland highlighted that details of the members were given at Annex C of his written report with full biographies on the website. Each member of WFAC brought a different focus to the discussions.
100. Roland paid tribute to former WFAC member Louise Fielding who had sadly passed away in December 2013 saying she was sadly missed by all those who had known her.
101. Roland then went on to highlight some of the successes over the last 18 months as listed in paragraphs 4.3 to 4.8 of his written report:
- The FSA Strategy 2015-2020 – WFAC members had welcomed the opportunity to contribute to the development of the Strategy by taking part in two workshops in Wales
 - Welsh Government's Food and Drink Action Plan – WFAC members had played a valuable role in contributing to the FSA's response to this consultation in February 2014
 - Raw drinking milk – Roland commended the two WFAC members who had taken part in the FSA stakeholder event in March 2014
 - Skin on sheep – WFAC at its meeting on 22 January had again welcomed the decision for the policy lead on this to rest in Cardiff and was encouraged by the desk top survey which had now been commissioned to look at plugging the gaps in our knowledge in order for us to strengthen our case to EFSA.
102. And so to the next 18 months. WFAC would continue to be reflective of the issues being discussed by the Board and already had in the diary a series of visits it wished to undertake including:
- A tour of the centre of excellence for Sustainable Food Production at Swansea University;
 - A visit to Zero 2 five , Food Industry Centre at Cardiff metropolitan University; and
 - A visit to a slaughter house.
103. Finally, Roland expressed his thanks to past and present Board members and past and present WFAC members, in particular his predecessor John Spence, who had given, and continued to give, him so much support and help.
104. Roland thanked Nina Purcell, Director FSA Wales, and all the staff in the Cardiff office for their hard work. He thanked the Executive for presenting papers to WFAC during their open meetings and for answering all the Committee's queries. Finally, Roland thanked the Chair for his willingness to help and his local knowledge of Wales.

105. The Chair then said he would invite the FSA in Wales Director to present the next paper before taking questions from the Board on both papers together.

FSA IN WALES: DIRECTOR'S UPDATE FSA 15/01/08

106. The Chair welcomed Nina Purcell, Director FSA Wales, to the table and invited Nina to introduce her paper.
107. Nina outlined the content in the paper, emphasising the importance of collaboration with LAs and others to deliver benefits to Welsh consumers. It was excellent to see in this context the progress that had been made with FHRS in Wales. The percentage of Welsh food businesses with a 5 rating had risen from 33.2% in March 2012 to 54.3% in September 2014. Over the same period the number of businesses in Wales with a rating of 3 or higher had risen from 80.8% to 92.6%.
108. Significant progress has also been made on improving the delivery of feed controls and, in November 2014, Ministerial agreement was obtained for revenue support grant funding to transfer to the FSA to progress official feed controls. The FSA in Wales was now working with local authority representatives to develop and implement an effective model for feed controls in Wales from April 2015.
109. The FSA in Wales had committed to audit all local authorities in Wales over a three year period commencing April 2013. To date, full audits of local authority food hygiene, food standards and feed services had been carried out in ten local authorities. A further twelve remained and these would be completed by March 2016.
110. Some priorities for the FSA in Wales for 2015-16 were:
- To restructure the FSA Wales office to strengthen key areas
 - To focus on audit activity arrangements
 - To review the Food Fraud Co-ordination Unit and how it aligned with the Food Crime Unit
 - To establish a consumer engagement strategy for Wales including the use of consumer forums
111. Nina concluded by thanking the FSA Wales staff, WFAC and stakeholders for making her first year as Director of FSA Wales such a success.
112. A Board member, who did not sit on a Food Advisory Committee, thanked the three FACs for the essential and well-informed contributions they made to Board discussions.

113. In response to questions from the Board on mandatory FHRs display in Wales Nina said LAs in Wales saw the display of FHRs ratings as important and where an establishment had a poor rating LAs monitored them to ensure they displayed their rating. The Board commented that the extension of the ratings scheme to include business to business trade was important and augured well for the future.
114. Regarding the rating of Local Authority audits in Wales, Nina said the Red/Green ratings in the stocktake report published in July 2014 had acted as a powerful visual in highlighting implementation by Welsh local authorities of the 2009 Pennington recommendations. FSA in Wales had continued to work with LAs and in the light of all audits was looking to refine and agree an approach to increase the transparency and accessibility to the FSA's reporting of audit findings.
115. A Board member referred to the Welsh Government's target of a 30% increase in the food industry in Wales by 2020 and asked if FSA Wales had taken that into account in its forward planning. Nina said that FSA Wales was at the table for discussions on the Welsh Government's Food and Drink Action Plan so they could ensure that the security and safety of food was included in the growth agenda and recognised that if this began to put unmanageable pressure on the FSA that would need to be raised with Ministers in a timely fashion.
116. The Chair concluded by saying that the FSA had a good relationship with Ministers in Wales and thanked Nina and the staff in the FSA Wales office for helping to achieve this. He also thanked Roland for multi-tasking as Chair of WFAC and member of the Advisory Committee on Dangerous Pathogens. Finally, the Chair thanked the members of WFAC for their continued contributions and support to the Board.

FSA AUDIT AND RISK ASSURANCE COMMITTEE – ORAL REPORT

117. The Chair invited the Chair of the FSA Audit and Risk Assurance Committee (ARAC), Paul Wiles, to present his oral report to the Board.
118. Paul said ARAC had last met on 16 December 2014 and had had a single item on the agenda which was to discuss the FSA's approach to risk as this was the first time since the Audit and Risk Committees had merged that they had had the chance to discuss risk.
119. The new FSA Strategy had identified new emerging risks in the food system. This would mean that the FSA's operating environment would include a higher level of risk and the FSA would have to take risks to respond to these new challenges. The question would not be should we take risks, rather can we

identify the risks correctly and manage them in order to continue to protect consumers.

120. Paul said it would be for the Board to take a view on the risk appetite of the organisation and contribute to identifying the strategic risks that faced the organisation, while it would be for ARAC to assure the mechanisms and processes in place to address those risks.
121. The Chair thanked Paul for his report and noted that the Board and Executive had participated in the annual risk workshop the previous day.

**MEMORANDUM OF UNDERSTANDING BETWEEN THE FSA AND FOOD
STANDARDS SCOTLAND (FSS) FSA 15/01/15**

122. The Chair welcomed Chris Hitchen, FSA Director Finance and Strategic Planning, David Lowe, FSA (UK) Transition Manager New Scottish Food Body, and Geoff Ogle, Director FSA Scotland, to the table.
123. The Chair welcomed Ross Finnie, who had attended the Board meeting as an observer, as the incoming Chair of FSS.
124. The Chair said the relationship between the FSA and FSS would be more than what was in the Memorandum of Understanding (MoU). This paper had been brought to the Board for comment; there was minor drafting still to be done to the MoU but the Board were not being asked to agree the definitive document.
125. The Board welcomed the spirit of the MoU and suggested that occasional Board to Board meetings may be of value.
126. In answer to a question Catherine Brown clarified that the FSA would be happy to consider collaborative working through the FSA Chief Scientific Advisor (CSA) with FSS but recognised that FSS were likely to appoint their own CSA.
127. Catherine also clarified that the escalation route for any disagreements between the FSA and FSS in the EU arena was already set a higher level by the Westminster and Scottish Governments.
128. The Chair concluded by saying he was sure that at all levels within the FSA and FSS we would work to avoid the formal escalation route for disagreements by sitting down and talking together. He had met with Ross Finnie last week and they had discussed the fact that particularly in the early stages it would be important to communicate regularly to understand our differences as well as our areas of agreement.

REPORTS FROM THE CHAIRS OF THE FOOD ADVISORY COMMITTEES (INFO 15/01/01–03)

129. Henrietta Campbell, the Chair of NIFAC, paid tribute to NIFAC member, Sydney Neill, who had sadly passed away in November saying he would be sadly missed by all those who had known him.
130. There were no comments from or for the Chair of SFAC, Jim Wildgoose, on his report.
131. Roland Salmon, Chair of WFAC, asked that WFAC's satisfaction at the progress being made in putting official feed controls in Wales on a sounder footing be put on record.

ANY OTHER BUSINESS

132. The Chair advised that there was no other business to report and closed the Board Meeting.

DATE OF NEXT MEETING

133. The next meeting of the FSA Board would take place on Wednesday 25 March 2015 in Aviation House, London.

**MINUTES OF THE FSA BUSINESS COMMITTEE MEETING HELD ON 28
JANUARY 2015 AT ST DAVID'S HOTEL, CARDIFF FROM 13:50 – 14:50**

Present:

Rod Ainsworth, Director of Legal and Regulatory Strategy
Tim Bennett, Chair
Liz Breckenridge
Catherine Brown, Chief Executive
Lynne Bywater, Director of Human Resources
Henrietta Campbell, Deputy Chair
Jason Feeney, Chief Operating Officer
Ram Gidoomal
Jeff Halliwell
Chris Hitchen, Director of Finance and Strategic Planning
Stephen Humphreys, Director of Communications
Maria Jennings, Director Northern Ireland
Geoff Ogle, Director Scotland
Heather Peck
Nina Purcell, Director Wales
Roland Salmon
Jim Smart
Steve Wearne, Director of Policy
Jim Wildgoose
Paul Wiles

Apologies:

Professor Guy Poppy, Chief Scientific Adviser

In attendance:

John Barnes, Head of Local Delivery
Richard McLean, Head of Planning, Performance and Change
Rebecca Merritt, Head of Private Office
Liz Olney, Head of Operations Assurance
Wendy Taylor, Acting Head of Health and Safety

WELCOME AND ANNOUNCEMENTS

1. The Chair welcomed everyone to the meeting.
2. The Chair reminded everyone to declare any relevant conflicts of interest before discussions.

**MINUTES OF BUSINESS COMMITTEE MEETING HELD ON 5 NOVEMBER 2014
(FSA 15/01/09)**

3. There were no amendments to the minutes and these were accepted as an accurate record of the 5 November 2014 meeting.

ACTIONS ARISING (FSA 15/01/10)

4. The Chair asked that the Progress to Date column for the Action Index 5 Nov 2104 – 14/11/09 *Performance Update on Operational Activity – Chief Operating Officer* be updated to say 'In progress'.

ACTION: Board Secretariat

HEALTH, SAFETY AND WELLBEING (FSA 15/01/11)

5. The Chair welcomed Wendy Taylor, Acting Head of Health and Safety, to the table and asked Lynne Bywater, Director of Human Resources, to introduce the paper.
6. Lynne said this paper provided an update on three areas:
 - Health and safety targets;
 - Management of bovine tuberculosis as an occupational risk; and
 - Staff wellbeing within the FSA
7. Lynne said there were no statistics included in this paper as they were included in paper FSA 15/01/13 Resource and Performance Update – January 2015.
8. In response to questions from Board members, Wendy Taylor said that: in addition to supporting the get fit by walking campaign, we were open to mirroring other NHS initiatives such as the stop smoking campaign; and we were working closely with risk assessors to identify the different kinds of stress staff working in the FCU were likely to encounter compared to other staff in the Agency and how to deal with them.
9. During discussion on bullying and harassment, Wendy said incidences of bullying and harassment were slowly starting to come down. The FSA Anti-Bullying and Harassment Group continued to monitor the situation and had recently put out a video for staff.
10. Catherine Brown agreed that Meat Hygiene Inspectors appreciated the FSA pulling its services out of Food Business Operators (FBOs) where bullying was taking place. Geoff Ogle said there had been an increased focus by industry on

bullying and FBOs had proactively dismissed staff responsible for it as they took the FSA's zero tolerance approach seriously; the situation was quite different from 3-4 years ago.

11. The importance of close collaborative working with FBOs to reduce accidents in meat plants for our staff was acknowledged and emphasised.
12. The Chair said that he hoped the report due from the Advisory Committee on Dangerous Pathogens would recognise that the management of the risk of Bovine Tuberculosis (*M. bovis*) was not only about controlling the environment in which TB-reactor cattle were slaughtered and inspected, but also about the risks associated with all cattle coming from high risk areas.
13. In conclusion the Chair emphasised the Board's ongoing commitment to health, safety and wellbeing.

**UK LOCAL AUTHORITY FOOD LAW ENFORCEMENT ANNUAL REPORT
2013/14 (FSA 15/01/12)**

14. The Chair welcomed John Barnes, FSA Head of Local Delivery, to the table and asked Jason Feeney, FSA Chief Operating Officer, to introduce the paper.
15. Jason said that there was now a mix of hard and soft data on the sustainability of LA services going forward; some LAs were going beyond continuous improvement initiatives and coming up with more imaginative solutions such as merging services, different funding models and targeting of resources.
16. Jason highlighted that the data showed greater improvement in food business compliance levels in Wales over the last year than the rest of the UK.
17. John Barnes said overall the picture showed that LAs at the time of publication were still coping with their hygiene responsibilities but that there were significant problems with the decreasing numbers of Food Standards Officers and the consequent ability of LAs to meet their responsibilities in line with the Code of Practice for standards work. There had been increased activity in food standards compositional sampling however.
18. A Board member said the easy cuts in LA spending in England had been made but after the General Election there were likely to be more cuts and at a faster rate. The Board would have to look at how these further cuts would impact on consumer protection and the FSA's responsibilities as competent Authority at a later date.

19. The Chair said in terms of data collection we needed to be smarter to minimise unnecessary burdens on LAs. John confirmed that we were looking at what data we collected and what data was useful to LAs to allow them to benchmark against each other.
20. A Board member asked if the FSA were using the 70 000 complaints LAs dealt with about food establishments in 2013/14 as a source of intelligence. It was noted that there was more scope for analysing this intelligence but that it would require substantial effort to collect and analyse and this needed to be considered as part of the regulatory and information work currently underway. The number of complaints in Wales had increased over and above the rest of the UK which was perhaps due to mandatory FHS generating more feedback over lack of display.
21. A Board member said there had been progress in the way this data was presented but it would still be useful for soft information to accompany the statistics to alert the Board to areas where there were concerns.
22. Regarding the 10 LAs which had not done any sampling, John said they would be audited to identify if there were ongoing problems.
23. The Chair concluded by saying that the Board had noted the statistics, trends and issues identified in the paper.

RESOURCE AND PERFORMANCE UPDATE – JANUARY 2015 (FSA 15/01/13)

24. The Chair welcomed Richard McLean, FSA Head of Planning, Performance and Change, to the table and invited Chris Hitchen, FSA Director of Finance and Strategic Planning, to present the paper.
25. Chris said this was the first report in the new format which was a work in progress. The report sought to link performance to resources in order to drive better outcomes for consumers. Chris said he would appreciate the Board's views on the use of the three levels of reporting.
26. The Board commented on the improvements in sickness absence levels which were better than the Civil Service average despite the FSA's high number of frontline staff working in challenging environments.
27. In response to a question from a Board member on improved numbers of meat FBOs complying with the Regulations, Liz Olney explained that the implementation of the new audit system for meat establishments in August 2014

had contributed to businesses coming out of the Cause for Concern category increasing numbers achieving overall compliance.

28. In response to a question from a Board member, Nina Purcell, Chair of the FSA Portfolio Board, explained that those programmes listed as 'New to Portfolio' would now gain traction due to the Board's clearance of the Regulatory Strategy.
29. A Board member asked how financial resources used compared with what the forecast had been; Chris said that all areas were green and it had been a typical year for the FSA except for the Westminster programme budget which had been much closer to budget than normal due to improvements in controls.
30. Catherine explained that in the spirit of working at pace, some of the proposed dates for the focus papers as listed in the paper had to be changed already to accommodate relative importance and resource. As long as the Board agreed to themed discussions, the focus papers would be scheduled in to the Committee's forward agenda plan.
31. The Chair concluded by saying that the Board were supportive of the new format of the paper including the use of the three levels of reporting and the inclusion of KPIs, and agreed that the topics for the focus papers should be scheduled into the Committee's forward agenda plan.

ACTION: Board Secretary

PERFORMANCE UPDATE ON OPERATIONAL ACTIVITY (FSA 15/01/14)

32. Ram Gidoomal declared an interest in this paper as a member of the External Relations Group of *Water UK*, the representative body of all UK water bodies. The Chair said he did not believe this position, of which he was aware, warranted precluding Ram from partaking in the discussion.
33. The Chair welcomed Liz Olney, FSA Head of Operations Assurance, to the table and invited Jason Feeney to present the paper.
34. Jason said the aim was to merge this paper into the Resource and Performance Update; if not for the next quarter then for the one after.
35. Liz said following the launch of the new audit arrangements for FSA approved meat establishments across the UK in August 2014 there had been the challenge of recruitment and the team had only been at full complement as of January. The new system was popular with industry because the new report

was easy to understand and focused and the specialist auditors were credible and experienced vets.

36. During discussion with the Board on the new audit system Liz said that: the length of the recruitment campaign had not been due to a shortage of suitable people to recruit rather the number of steps to go through to be able to recruit externally in accordance with Civil Service rules; and that the new system was popular with meat FBOs because they had asked for it and had collaborated in creating it and so felt proud of it.
37. Catherine agreed that the meat FBOs liked the specialist audit team because they understood the business and could make comparisons which enabled the FBOs to have real discussions about the business with them. Catherine said sometimes efficiency required specialism and this was a lesson to be learned for the delivery of official feed controls.
38. With regard to audits of local authority delivery of official controls in England, one large unitary authority had merged services and introduced a new system for mobile working. Liz was able to inform the Board that other authorities had been in contact with that LA to learn more about moving to mobile working. Liz also reassured the Board that the FSA Local Delivery team regularly created opportunities for LAs to share best practice.
39. The Chair concluded by saying that the Board had noted the information in the report.

ANY OTHER BUSINESS

40. There was no other business and the Chair closed the Business Committee meeting.

DATE OF NEXT MEETING

41. The next meeting of the Business Committee would take place on 25 March 2015 in London