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## **FOOD STANDARDS AGENCY CONSULTATION**

### **The Feed Law Code of Practice Review**

#### **Response from the Government Chemist**

As Government Chemist, I am responsible under certain Acts of Parliament<sup>1</sup> for providing independent analytical measurement and expert opinion to help avoid or resolve the disputes over scientific data which arise from time to time between local authorities and the businesses that they regulate. My public remit also covers wider advice to UK government and other affected parties on the role of analytical measurement in effective policy, standards and regulations. My staff liaise with regulatory services involved in sampling, analysis and product testing linked to the investigation of alleged non-compliances. I am pleased to be able to respond to this consultation particularly as many of the aspects covered appear frequently as the subject of referee casework<sup>2</sup>.

Overall I support the initiatives that have been proposed in the consultation document. Many of the questions asked are not within my sphere of competence. However, there are some important points which I need to raise which I believe to be pertinent to the consultation:

- The integration of the underpinning scientific assessment of feed safety, standards and labelling is a crucial function carried out by officially appointed Agricultural Analysts;
- There is, in the Government Chemist function, a route to referee analysis should disputes occur on the analytical results of official feed analysis, or their interpretation;
- Training and assessment of competency of sampling officers should include update training on optimising the use of analytical testing and liaison with the official Agricultural Analyst. If necessary I am happy that we are able to advise further on these aspects.

<sup>1</sup> Boley, N. Government Chemist Legislation, Annual Statement of Statutory Scope, January 2013, available at <http://www.governmentchemist.org.uk/Generic.aspx?m=77&amid=1623>

<sup>2</sup> Michael J Walker and Kirstin Gray, 2013, *Quis custodiet* – a Review of the Resolution of Disputed Chemical Results in the UK Official Feed and Food Control System 2010 – 2011, *J Assoc Public Analysts* (Online) 2013, 41, 1-27



Thank you for this opportunity to comment.

Yours sincerely



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**The Government Chemist**