

Department for Environment, Food and Rural Affairs

Post implementation review of the Seed Marketing Regulations England 2011/463

March 2017

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1. Introduction

This document provides an overview of the Post Implementation Review (PIR) of the Seed Marketing Regulations England (SMRs) 2011 No.2992 as amended) ('the 2011 Regulations'). These Regulations provide the legislative basis for the compliance regime for implementing measures made under the following EU Directives – 66/401/EEC, 66/402/EEC, 2002/53/EC, 2002/54/EC, 2002/55/EC, 2002/57/EC, 2008/62/EC and 2009/145/EC. A copy of the PIR can be found at Annex A.

In line with BEIS guidance on medium impact measures, a decision was taken for this PIR to review the whole of the SMRs. In particular whether they meet their intended objectives, whether there is scope for improvement and were there any benefits of the consolidation exercise carried out in 2011.

2. Background

This particular regulation was a consolidation of six existing regulations from 2002; five Seed Marketing (England) Regulations, controlling the certification and marketing of seed of cereals, beet, fodder plant, oil & fibre plant and vegetables, and The Seed (Registration, Licensing and Enforcement) (England) Regulations. The new regulation consolidated the provisions of those previous instruments into one single set of regulations without any changes to their objectives.

The regulation implements EU Directives which have existed since the late 1960s to control the certification and marketing of seed of the main agricultural and vegetable species. Seed cannot be marketed within the EU unless it is officially certified and of a variety on the UK National List or the Common Catalogue. This certification assures varietal identity and seed quality, protecting buyers, whether another seed company, farmers or other consumers. The primary beneficiaries of the service are seed producing companies, who cannot otherwise sell seed of species covered by the legislation, and their customers who benefit from the consumer protection it provides.

3. Summary of the Regulations' objectives

The overriding objective is to assure the quality of marketed seed through a statutory certification framework for the main agricultural and vegetable crops. This certification assures varietal identity and seed quality, protecting buyers, whether another seed company, farmers or other consumers. Seed cannot be marketed within the EU unless it is officially certified and of a variety on the UK National List or the Common Catalogue.

4. Scope of the PIR

An impact assessment was not completed for the consolidation of the six regulations as it was not considered to introduce any new regulatory burdens. The decision for this PIR is

to review the whole of the England SMRs, in particular whether they meet their intended objectives, whether there is scope for improvement and were there any benefits of the consolidation exercise. The scope of evidence for this review was key information routinely collated by APHA, Defra's Animal and Plant Health Agency who implement the services with the National Institute of Agricultural Botany (NIAB) as contractor, and enforce the regulations. In particular, fees and costs in relation to the drive for full cost recovery, seed company audits, and rates of failure to meet statutory standards. Failure rates were also the basis of comparison with other EU Member States in testing the assumption that the England schemes are run efficiently.

5. Research Analysis

PIR guidance provides three overarching research questions to be addressed:

- a. To what extent are the Regulations working?
- b. Is government intervention still required?
- c. Are the Regulations and the way they are implemented the most appropriate approach?

The evidence for this PIR has been collated from APHA and NIAB data produced in the course of their service delivery functions, from the businesses using their services and from Certification Authorities in some other Member States.

The overarching questions have been addressed through feedback from the main industry associations in England whose members have a direct interest in the SMRs. It is considered that these bodies represent a significant cross-section of the seeds industry, and that limiting the informal consultation to these bodies is sufficient and proportionate to confirm the information as supplied in the PIR. A questionnaire was submitted to these bodies asking to what extent the England SMRs objectives have been achieved, in particular costs and efficiency of the system in delivering the required outputs.

Comparisons were made with some EU Member States, and with Scotland, having a similar market set-up to England. The resulting evidence showed a similar level of effectiveness across the different seed certification systems, looking at costs, failure rates for seed quality, and company audits.

6. Cost Benefit Analysis

Seed companies' own costs for field inspection, seed sampling and seed testing are difficult to estimate, in part because these quality assurance measures are integral to seed production, regardless of being a statutory requirement. However, they are the largest part of the seed certification process, emphasising that the official role is primarily to monitor the activities of seed companies and the quality of marketed seed.

Information from the latest full year (2015/16) for the certification system was estimated total costs of about £3.6m. Enforcement costs are not recoverable through fees, leaving a

final cost to the industry of about £3m, approximately £2m of which was for field inspection, seed sampling and seed testing by businesses.

7. Next steps

We are required to seek independent scrutiny of the PIR from the Regulatory Policy Committee (RPC). The RPC's Opinion is at Annex B. They rated the PIR it as 'fit for purpose', noting that it provides sufficient evidence to support Defra's proposal to renew the regulations, given their scale and effectiveness.

On 23 June, the EU referendum took place and the people of the United Kingdom voted to leave the European Union. Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. During this period the Government will continue to negotiate, implement and apply EU legislation. The outcome of these negotiations will determine what arrangements apply in relation to EU legislation in future once the UK has left the EU. The assumptions used in this PIR have been chosen accordingly.

Feedback from the main UK stakeholders suggests that the England SMRs are necessary to maintain the quality of marketed seed, achieving their objectives without any unintended effects and they should remain in place. However, following the outcome of the EU referendum, the industry sees an opportunity to discuss and review the regulations.

Annex A: Post Implementation Review

<p>Title: Seed Marketing Regulations</p> <p>IA/PIR No:</p> <p>Lead department or agency: Defra</p> <p>Other departments or agencies:</p> <p>Contact for enquiries: Michael.watts@defra.gsi.gov.uk</p>	<p>Post Implementation Review</p> <p>Source of intervention: Domestic</p> <p>Type of regulation: secondary</p> <p>Type of review: Statutory</p> <p>Date of implementation: 06/01/2012</p> <p>Date review due (if applicable): 06/01/2017</p>
<p>Summary</p>	<p>The Seed Marketing Regulations (SMR) implement long standing EU Council Directives on the marketing of beet, fodder, cereals, oil and fibre plants and vegetables which prescribe minimum quality standards for seeds to ensure that purchasers receive seeds of a reasonable and uniform quality. The directives set out conditions covering all aspects of production and marketing including checks on varietal and analytical purity, germination and conditions and procedures for the official examination of crops and the testing of seeds. The licensing and enforcement regulations licence companies to market certified seeds and licence individuals to undertake certain crop inspection and seed sampling functions under official supervision.</p>

1a. What were the policy objectives and the intended effects? (If policy objectives have changed, please explain how).

The regulations provide a statutory framework for the marketing of seed of the main agricultural and vegetable crops, assuring the quality of marketed seed to farmers to grow a commercial crop. The regulations directly affect about 100 businesses producing seed of agricultural crops in England and about 600 businesses retailing seed to farmers.

This particular regulation was a consolidation of six existing regulations from 2002; five Seed Marketing (England) Regulations, controlling the certification and marketing of seed of cereals, beet, fodder plant, oil & fibre plant and vegetables, and The Seed (Registration, Licensing and Enforcement) (England) Regulations. Subsequently this new regulation consolidated the provisions of those previous instruments into one single set of regulations without any changes to their objectives. This resulted in condensing some 500 pages of protracted complicated regulations into a single instrument of around 50 pages making the regulations more understandable and easier to use. There have been a few minor changes to the SMRs since 2011 none of which have had a major impact or significantly changed policy objectives. The impacts of these minor changes will be picked up as part of the wider review of the efficacy of the SMRs.

This regulation implements EU Directives which have existed since the late 1960s to control the certification and marketing of seed of the main agricultural and vegetable species. Seed cannot be marketed within the EU unless it is officially certified and of a variety on the UK National List or the Common Catalogue. This certification assures varietal identity and seed quality, protecting buyers, whether another seed company, farmers or other consumers. The primary beneficiaries of the service are seed producing companies, who cannot otherwise sell seed of species covered by the legislation, and their customers who benefit from the consumer protection it provides.

1b. How far were these objectives and intended effects expected to have been delivered by the review date? If not fully, please explain expected timescales.

The objectives of the previous regulations from 2002 were carried forward into the consolidated single regulation of 2011 and in effect have been in place and fully delivered against since 2002.

2. Describe the rationale for the evidence sought and the level of resources used to collect it, i.e. the assessment of proportionality.

An impact assessment was not completed for the original consolidation of the six regulations as it was deemed not to introduce new regulatory burdens. The objective of this PIR is to review the whole of the SMRs and in particular whether they meet the intended objectives, whether there is scope for improvement and were there any benefits of the consolidation exercise.

The scope of evidence for this review will look at key information that is routinely collated by the Animal and Plant Health Agency (APHA), an executive agency of Defra, in particular fees and costs in relation to the drive for full cost recovery, company audits and the efficacy of the seed certification systems looking at pass/failure rates for varietal purity and seed quality.

Stakeholder feedback has been addressed through an informal consultation with the main trade associations in England whose members have a direct interest in the SMRs. The main UK stakeholders operating in England are the National Farmers Union, the British Society of Plant Breeders, the Agricultural Industries Confederation and the National Association of Agricultural Contractors. It is considered that these bodies jointly represent most of the Seeds industry, and that limiting the informal consultation to these bodies is sufficient to confirm the information requirements of the PIR.

In addition the results will be used as a basis of comparison with other EU Member States in testing the assumption that the England schemes are run efficiently

3. Describe the principal data collection approaches that have been used to gathering evidence for this PIR.

The information has been collated from APHA and NIAB data produced in the course of their service delivery functions, from the businesses using their services and from the Certification authorities in other Member States. In particular the evidence will look at fees and costs in relation to the drive for full cost recovery, company audits and the efficacy of the certification systems based on pass/failure rates for varietal purity and seed quality.

APHA, as part of their management role, hold all the statistical data and information regarding the delivery of the SMRs and have been able to provide Defra with the information as part of their normal working procedures.

During 2013 a consultation regarding the revision of fees in order to achieve full cost recovery for statutory services was carried out. This formal consultation built on discussion with industry representative organisations during development of the associated impact assessment. These discussions were mainly through the Seeds Marketing Taskforce, a Government-business partnership whose key aim is supporting the drive for further service cost-efficiency gains.

The 2013 review of fees for seed certification resulted in a phased approach to achieve, as far as possible, full cost recovery in 2016/17. APHA have supplied the costs and fee income data over the five year period to date. During this five year period the delivery work was transferred in 2014 from the Food Environment and Research Agency (FERA) to APHA. APHA have a completely different cost base to FERA so information prior to October 2014 is therefore not comparable with the current information. The most recent figures covering a full year of APHA costs identified a recovery rate of 95.5% and these will be used as the basis for the analysis in this PIR.

3. Continued>

In terms of comparison with other Member States information was gathered through e-mail and face to face meetings with the administrations in Denmark, Netherlands, Germany and Poland. These Member states were chosen as they have similar market set ups to England all arriving at the same set of standards but with slightly different approaches. In addition information was gathered from Scotland which as a devolved administration has its own separate Seed Marketing Regulations.

The following questions were sent out to seek comparisons with the England SMRs regarding the seed certification systems looking at costs, pass/failure rates for purity/varietal identity and company audits.

- Does your equivalent national legislation introduce any higher standards or stricter requirements than the EU Directives?
- Have you conducted any analysis of the costs for government and industry of complying with the legislation which you could share?
- What is the percentage failure rate for post control plots of final generation seed lots?
- What is the percentage failure rate for official samples of seed taken at the point of sale?
- What if any are the overall audit results of the companies or individuals for functions carried out under official supervision?

Stakeholder feedback has been addressed through an informal consultation with the main trade associations in England whose members have a direct interest in the SMRs. The main UK stakeholders operating in England are the National Farmers Union (NFU), the British Society of Plant Breeders (BSPB), the Agricultural Industries Confederation (AIC) and the National Association of Agricultural Contractors (NAAC). It is considered that these bodies represent a significant cross-section of the Seeds industry, and that limiting the informal consultation to these bodies is sufficient and proportionate to confirm the information supplied in this PIR.

AIC provides a united voice for its members representing them at both UK (with Defra and other government, non-government bodies and organisations) and European Government level.

The NFU champions all farmers and growers in England and Wales with members accounting for two-thirds of the agricultural land in England and Wales.

NAAC represent all Agricultural and Amenity contractors in the UK at National and European Government level.

BSPB works for its members in promoting the understanding of the science and business of plant breeding and representing its members' interests with regulators, policy makers, research funders and other industry organisations

The Defra Variety and Seeds team are in constant contact with these representative bodies through regular biannual meetings. It was deemed appropriate to issue an e-mail questionnaire to gain their feedback. The following questions were asked:

1. Were the benefits of the consolidation exercise realised?
2. To what extent are the Regulations working in achieving their intended objectives?
3. Have there been any unintended effects?
4. Are the Regulations and the way they are implemented the most appropriate approach?

Included in the questionnaire was an explanation of what a PIR is, hard evidence supplied by APHA and the feedback from Scotland and the consulted EU Member States.

3. Continued>

Feedback from the representative bodies agreed that the England SMRs are necessary to maintain the quality of marketed seed, are achieving their objectives without any unintended effects and should remain in place. However, following the outcome of the EU referendum, the Industry has seen this as an opportunity to discuss and review the regulations going forward. These discussions will take place as part of the routine biannual stakeholder meetings between Defra and the representative bodies.

Due to resource issues BSPB were the only stakeholder that could not respond. This is not a major setback as the NFU, AIC and NAAC represent the interests of the vast majority of seed merchants, producers and consumers. BSPB are primarily interested in breeding and developing new varieties.

Replies to these questions can be supplied upon request.

4. To what extent has the regulation achieved its policy objectives? Have there been any unintended effects?

The Seed Marketing Regulations (SMRs) implement long standing EU Council Directives on the marketing of beet, fodder, cereals, oil and fibre plants and vegetables which prescribe minimum quality standards. The SMRs provide a quality seed certification system to protect farmers and their customers by ensuring that the seed they buy meets certain quality standards. The standards include varietal identity and purity, germination and freedom from weed seeds. These standards also support the multiplication of new varieties in sufficient quantity to meet demand from growers and end users supporting breeders and new and emerging market opportunities. There have not been any unintended effects.

The evidence gathered suggests that the England SMRs have met their objectives. The following are the results of the evidence supplied by APHA, the comparisons with other EU Member States including the devolved administration of Scotland and feedback from the main stakeholder bodies in England.

APHA's evidence showed that the failure rates for post control of final generation seed lots in England over the past 5 years is just under 1%. Failure rates for the evidence supplied by Scotland and the EU member states consulted are slightly higher.

APHA's evidence showed that the failure rates for official samples taken at point of sale have over the last 5 years not exceeded 1%. These figures are in keeping with the EU Member States consulted and lower than Scotland's.

APHA's evidence showed that the overall audit results of the companies or individuals for functions carried out under official supervision have initially highlighted some discrepancies of which most were either resolved or not of significance. These audit results compare favourably with those of the EU Member States consulted and Scotland.

England does have higher voluntary standards (HVS) for cereal and fodder seeds that are higher than the minimum standards required by the EU directives. This HVS is welcomed by the industry. England are not alone in having HVS. Being a voluntary standard this does not stop seed of EU minimum standard being freely marketed.

The most recent figures for England have identified a cost recovery for the certification process in the region of 95%. A consultation on the level of cost recovery across the EU Member States revealed a mixture of results ranging from near full cost recovery in the UK (95%) to no recovery.

The evidence provided was shared with the industry as part of the informal consultation.

Informal feedback from the main UK stakeholder organisations operating in England agreed that the England SMRs are necessary to maintain the quality of marketed seed, are achieving their objectives without any unintended effects and should remain in place.

4. Continued>

However, following the outcome of the EU referendum, the Industry has seen this as an opportunity to discuss and review the regulations going forward. These discussions will take place as part of the routine biannual stakeholder meetings between Defra and the representative bodies.

5a. Please provide a brief recap of the original assumptions about the costs and benefits of the regulation and its effects on business (e.g. as set out in the IA).

This particular regulation was a consolidation of six existing regulations from 2002; five SMRs, controlling the certification and marketing of seed of cereals, beet, fodder plant, oil & fibre plant and vegetables, and The Seed (Registration, Licensing and Enforcement) (England) Regulations. Subsequently this new regulation replaced the provisions of those previous instruments into one single set of provisions without any changes to their objectives and consequent effects. An impact assessment was not completed for the original consolidation of the six regulations as it was deemed not to introduce new regulatory burdens. The objective of the PIR is to review the whole of the SMRs to assess whether they meet the intended objectives, whether there is scope for improvement and were there any benefits of the consolidation exercise. For growers in England to participate in the single market it is a requirement of European Commission Directives that seed of most agricultural species must be officially certified.

5b. What have been the actual costs and benefits of the regulation and its effects on business?

The consolidation exercise was seen as a positive move by reducing 500 pages to just 50. The outcomes and requirements are unchanged but it is easier to navigate.

The SMRs continue to assure the quality of marketed seed thereby protecting the purchasers of seed whether they be other seed companies, farmers or other consumers.

The SMRs achieve the desired effect to a very large degree in terms of delivering the requirements of the Seed Marketing Directives at an acceptable level of cost.

Seed companies' costs for field inspection, seed sampling and seed testing are difficult to estimate, in part because these quality assurance measures are integral to seed production, regardless of being a statutory requirement. However, they are the largest part of the seed certification process, emphasising that the official role is primarily to monitor the activities of seed companies and the quality of marketed seed.

Information from the latest full year costs (2015/16) for the certification system was about £3.6m. Enforcement costs are not recoverable leaving a final cost to the industry of circa £3m, approximately £2m of which was for field inspection, seed sampling and seed testing by businesses.

Over the course of the past five years, significant cost savings have been achieved in the overall management and delivery of the seed marketing services. Savings in the region of £90,000 per annum have been made which equates to just over 5% of the total recoverable cost. This includes discussion with stakeholders ahead of formal consultations on fee increases, mainly through the Seeds Marketing Taskforce, a Government-business partnership whose key aim is supporting the drive for further service cost-efficiency gains. The Taskforce is temporarily on hold pending a new Technical Service Contract (TSC) invitation to tender. The new TSC should be in place by early 2017. A new Taskforce will be set up following the award of contracts.

5 b continued.

In addition, England also took advantage of Commission Implementing Decision 2012/340/EU, to allow seed company personnel to inspect, under a system of licensing, crops entered to produce pre-basic and basic seed. This had the potential to significantly reduce crop entry fees for these categories, reducing total annual recoverable costs by up to £140,000 or 8% .

The quantitative evidence supplied by APHA showing failure rates of post control of final generation seed lots and failure rates for official samples taken at point of sale both averaged under 1%. Audit results from companies or individuals for functions carried out under official supervision initially highlighted a discrepancy rate of 5% of which most issues were resolved or not of significance. These results are comparable with those of the EU Member states consulted and Scotland.

These results coupled with feedback from the leading stakeholders show that the SMRs continue to deliver a quality service at an affordable cost to seed companies, farmers and other consumers.

6. Assessment of risks or uncertainties in evidence base / Other issues to note

Regarding the evidence for fees and income, there are two available data sets. The Fera Impact Assessment of October 2013 and APHAs refresh of March 2016 (covering October 2014 to September 2015 - APHA's first full year). However, the two data sets look very different as they are based on different financial models and are not directly comparable. For the PIR, APHAs March 2016 data has been used because responsibility for the delivery work has resided with APHA since being transferred to the agency in October 2014.

7. Lessons for future Impact Assessments

The evidence gathered through this PIR suggests that the SMRs continue to deliver a quality service at an affordable cost to seed companies, farmers and other consumer. All the information supplied was robust. Defra will continue to engage with industry stakeholders through 6 monthly bi-lateral meetings giving them the opportunity to discuss regulations and general seed matters.

8. What next steps are proposed for the regulation (e.g. remain/renewal, amendment, removal or replacement)?

On 23 June, the EU referendum took place and the people of the United Kingdom voted to leave the European Union. Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. During this period the Government will continue to negotiate, implement and apply EU legislation. The outcome of these negotiations will determine what arrangements apply in relation to EU legislation in future once the UK has left the EU. The assumptions used in this PIR have been chosen accordingly.

The research associated with this PIR supported the following:

The consolidation of the Regulations was seen as a positive move by the Seeds Industry. The underlying regulations did not change but the consolidation made it easier to navigate.

The Industry agreed that the regulations continue to achieve their intended objectives in providing a system to control the certification and marketing of seed for the main agricultural and vegetable species.

The Industry was not aware of any unintended effects of these regulations.

The Industry wants marketing of seed in England to continue to be regulated. The regulations as implemented are seen as an appropriate delivery mechanism with an acceptable level of cost. However, following the outcome of the EU referendum, the Industry has seen this as an opportunity to discuss and review the regulations going forward. These discussions will take place as part of the established bi-annual meetings between Defra and the main stakeholder representative bodies.

There is a strong correlation of outputs when comparing England's SMRs (and corresponding regulations in Scotland) with the evidence supplied by a number of other EU Member States.

In conclusion the England SMRs as set out in this Post Implementation Review will remain in place.

Opinion: post Implementation review

Origin : domestic

RPC reference number: RPC -3551 -DEFRA



Annex B: Regulatory Policy Committee Opinion Seed Marketing Regulations

Department for Environment, Food and Rural Affairs RPC

rating: fit for purpose

Description of measure

The PIR considers consolidated regulations on the marketing of beet, fodder, cereals, oil, fibre plants and vegetables that prescribed minimum quality standards for seeds. The requirements are intended to ensure buyers receive a reasonable and consistent quality, reducing the incidence and cost of crop failure. The required standards are set out in EU directives, which were transposed by the regulations.

The regulations were consolidated in order to reduce the length and complexity of the legislation, The Department has, however, chosen to use the PIR process to gather and present evidence on the efficacy of the underlying requirements, and not just on whether the objectives of consolidating the legislation were achieved.

Impacts of the measure

The consolidation reduced the length of the legislation from 500 to 50 pages, with the intention of reducing the burdens associated with understanding the regulatory requirements. An impact assessment was not produced for the consolidation. The Department states that the marketing requirements themselves come from longstanding EU requirements and, as such, have not been subject to an impact assessment either.

Two main areas of costs to business are discussed in the PIR – the cost to business of undertaking field inspections, seed sampling and testing to ensure seeds meet required standards, and the cost of the certification regime.

The PIR does not estimate the costs to businesses of undertaking their own activity (such as field inspections) to ensure compliance with the regulations – this is because the Department assumes these to be costs that are integral to the seed production process, most or all of which would be incurred regardless of the regulatory requirements. On the

basis of the evidence in the PIR, stakeholders appear to agree with this assessment. In particular, industry has adopted higher voluntary standards for cereal and fodder seeds, suggesting that industry views measures and requirements to improve the quality of seeds as beneficial.

Using information on the fees collected by the Animal and Plant Health Agency (APHA), the Department estimates that the licensing regime costs business £3 million each year. The Department estimates that improvements in the efficiency of the management and delivery of the seeds marketing service have resulted in annual savings to business of £90,000; and the taking up of EU flexibilities following an implementing Commission Decision to allow the licensing of seed company personnel to carry out inspections may have reduced costs by up to £140,000 per year.

Using further evidence from the APHA, the PIR states that the failure rate for seeds at the point of sale is less than 1%. The Department uses this as further evidence that the regulations have achieved their objectives of providing assurance to buyers.

Quality of submission


The PIR provides sufficient evidence to support the Department's proposal to renew the regulations, given their scale. The consultation exercise focused on informal engagement with representatives of trade associations. While this resulted in relatively few stakeholder responses, the Department explains that, as the trade bodies consulted represent the majority of businesses involved in seed manufacturing and purchasing, this represents an appropriate cross-section of the industry.

Prior to publication, the PIR could be improved through including some additional background information on the scale of the effects of the regulation. In particular, the Department may wish to include information on the potential costs of any changes to the rate of seed failure, such as an estimated cost to business of a one percentage point increase in failure rates, as this would provide further context for the assessment of the value of the regulations. The PIR would also benefit from some discussion of the number of businesses affected by the regulations, and the extent to which they may face administrative burdens, in addition to licence fees.

Departmental recommendation	Renew
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RPC assessment

Is the evidence in the PIR sufficiently robust to support the departmental recommendation?	Yes
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Mrs Gibson

Michael Gibbons CBE, Chairman

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