![Cabinet Office logo]

Common Frameworks Evaluation

Final report

July 2025

Contents

Executive Summary

What are Common Frameworks?

Devolution in Scotland, Wales and Northern Ireland means that devolved governments have the power to make policy in a range of devolved areas. Common Frameworks set out how the UK Government, Scottish Government, Welsh Government and Northern Ireland Executive work together across a range of devolved policy areas, from storing radioactive substances to food waste. The programme was jointly agreed and set up after the UK left the European Union (EU), as a mechanism to provide coordination across the UK or at GB-NI level on these areas.

Frameworks do not set out policy themselves; rather, they are non-statutory documents setting out how officials across the UK work together.

Why have we evaluated Common Frameworks and what does this evaluation focus on?

As this is a comparatively new approach to intergovernmental working, the UK Government decided to carry out an in-house process evaluation of Common Frameworks at this early stage, helping all governments to improve framework processes moving forward. Additionally, this follows an internal appraisal carried out by UK Government analysts in 2021 which recommended further evaluation of frameworks. This also supports parliamentary committee recommendations that the frameworks programme should be reviewed on an ongoing basis in its early stages.

The aim of the evaluation has been to assess how frameworks have been operating to date with a view to learning lessons for the future, especially in relation to:

- Governance arrangements
- Managing instances where governments take different approaches to policy or regulation, and
- Mechanisms for managing disagreement/dispute resolution.

It is not an impact evaluation of policies that the frameworks cover.

The evaluation is based on high-level data gathered across 28 frameworks through a proforma, and in-depth case studies into 6 Common Frameworks. Responses were gathered from officials working within UK Government, Scottish Government, Welsh Government, and the Northern Ireland Executive, to achieve an internal view on how these frameworks have been operating.

What are the key lessons learned from the evaluation?

The evaluation has identified six key factors to maximise the effectiveness of the programme going forwards.

1. Increased sharing of good practice across frameworks. There were positive examples of working within frameworks, in terms of information sharing and joint working, including areas where governments are pursuing different policy approaches. Frameworks were seen as adaptable to different contexts with individual frameworks having different governance structures depending on level of framework activity. Therefore, sharing learnings and good practice across frameworks would be beneficial - particularly on common issues.

2. Increasing co-ordination across frameworks. Specific processes may be helpful to manage areas of policy that interact with multiple frameworks, within the evaluation the Precision Breeding Act was one such area. However, the importance of pursuing this may depend on the likelihood that policies like this will emerge in the future.

3. Effective levels of stakeholder engagement. Approaches varied across different frameworks in relation to stakeholder engagement. Light touch sharing of examples where engagement has been helpful within frameworks could demonstrate how this can be beneficial.

4. Increasing wider knowledge and awareness of frameworks within governments. It was noted that, more widely across governments, there was not good knowledge and understanding of Common Frameworks. In some cases, this meant that frameworks were not utilised effectively in intergovernmental working in areas where they could be. It should be considered if there are ways to raise awareness of frameworks that could support them in working more effectively, to improve wider engagement with frameworks where required.

5. Central guidance and monitoring of key framework processes. Although it was seen as beneficial that frameworks can be adaptable to different policy contexts, there were some processes where consistency was more important and therefore where central guidance may be helpful. For instance, there was some confusion about what constitutes a formal dispute and how and when to instigate the formal dispute process. Central monitoring of the use of these processes will also be important to ensure that they are being used appropriately.

6. Further evaluation of frameworks in the future. This evaluation has provided an initial review of how Common Frameworks processes are working but officials felt there were some framework processes that had not been fully tested yet. For example, not all had experienced differences in policy approaches and very few had had formal disagreements. Future evaluation is recommended to monitor how framework processes are being used over time, particularly to understand how processes which have not yet been used as extensively are working. This could include gathering data from a broader range of stakeholders outside of government.

1 Introduction

1.1   Introduction to Common Frameworks

Devolution in Scotland, Wales and Northern Ireland means that devolved governments have the power to make policy in a range of devolved areas. Scotland, Wales and Northern Ireland also have devolved legislatures, which can make laws to enact that policy. When the UK was in the European Union (EU) decisions on some types of policy were made at EU level. After the UK left the EU these powers returned to the UK including, in some cases, to devolved governments. The Common Frameworks programme was set up as a mechanism to provide coordination in a subset of these policy areas which all governments agreed required UK or GB wide coordination.

There are currently 32 Common Framework policy areas owned by eight UK Government departments. Frameworks detail how the UK Government and one or more of the Scottish Government, Welsh Government and Northern Ireland Executive will work together in a range of areas. Frameworks do not set out policy themselves; rather, they are non-statutory documents setting out how officials across the UK work together – for example, through decision making and dispute management processes - to approach all sorts of everyday things like how safe food is, or the way products are recycled. Most of the frameworks are operational and have been scrutinised by the four legislatures. Finalised versions are published following ministerial agreement. As this is a comparatively new approach to intergovernmental working, the UK Government decided to evaluate Common Frameworks at this early stage, helping all governments to improve framework processes moving forward.

Frameworks are part of the UK's wider intergovernmental relations architecture: they are overseen by the four-nation Interministerial Standing Committee and each framework reports into the relevant Interministerial Group.[1] Parliamentary committees have a formal role in scrutinising frameworks in their policy areas, but legislatures have also taken an interest in the programme beyond this formal role. The House of Lords Constitution Committee has conducted scrutiny of the programme as a whole, and this evaluation will be shared with that committee.

1.2   Evaluation approach

This in-house process evaluation was conducted into Common Frameworks by UK Government analysts following an internal appraisal in 2021, which recommended further evaluation once frameworks were more established.

The evaluation has <u>not</u> been designed to assess the impact of frameworks. It aims to understand how the frameworks are currently functioning and to identify areas for improvement. The questions which this evaluation seeks to answer are listed below:

---

[1] [Intergovernmental relations - GOV.UK](https://www.gov.uk)

1. How well are the governance arrangements of different frameworks working to facilitate communication and agree action between relevant governments? Is there anything that could be improved in this regard?

2. To what extent are the processes in place within frameworks working - including those to resolve disputes, manage policy divergence, and ensure officials in teams managing the Common Frameworks feel involved in decision making processes? Could these be improved?

3. What factors facilitate successful implementation and delivery of Common Frameworks in different policy contexts?

All stages of data collection have involved officials from UK Government and the devolved governments. An independent Advisory Group for the evaluation has also been consulted at key stages of the evaluation, please see Annex A for further detail.

The evaluation was carried out in 2 stages between early 2023 and February 2024, as follows:

- **Stage 1** involved collecting proforma data in spring 2023 across all frameworks and conducting two initial in-depth case studies into the Public Procurement Common Framework in February 2023 and the Plant Varieties and Seeds Common Framework in May/June 2023.

- **Stage 2** of the evaluation involved four in-depth case studies into the Commercial Transport and Operator Licensing, Food and Feed Safety and Hygiene, Best Available Techniques, and Agricultural Support Common Frameworks between December 2023 and February 2024.

Proforma

The proforma included questions on the implementation and governance of frameworks, alongside the mechanisms in place for handling divergence and disputes, and how these are currently being used (as well as any emerging areas they may be used for in the future). This was to gain a broad insight into how frameworks were operating. At least one return was received from all 28 frameworks where returns were expected. Guidance was provided on how to complete the proforma, however, teams provided varying levels of information responding to the questions and some questions may have been interpreted differently by different officials (Annex B provides more detail on the proforma approach).

Case studies

The case studies were intended to give in-depth insight into how individual Common Frameworks were operating. Questions were asked around governance and communication, experiences of divergence and disputes, and wider contextual factors affecting working within the frameworks.

The case study frameworks were: Public Procurement; Plant Varieties and Seeds; Best Available Techniques; Food and Feed Safety and Hygiene; Agricultural Support and; Commercial Transport, and Operator Licensing. These were selected using a sampling matrix developed by analysts, which aimed to compare characteristics of all Common

Frameworks to ensure different characteristics were represented (more information can be found at Annexes C and D).

Interviews were carried out with at least one official within each government, and where possible an external stakeholder (see Annex E for details).[2] These external stakeholders were representatives from business groups. The limited number of interviews (as is standard for this type of qualitative research) means that this analysis is not representative of Common Frameworks as a whole. The case study findings cannot be used to generalise to Common Frameworks more widely but instead reflect in-depth insights into the workings of the individual Common Frameworks explored, with their limitations noted. Throughout the report, common themes from across these case studies have been drawn out.

Additional notes on interpretation

It has not been possible to explore all aspects of framework processes as part of this evaluation. For instance, none of the frameworks on which case studies were conducted had interacted with the UK Internal Market Act exclusions process and none had raised a formal dispute through the dispute resolution mechanisms.[3] This limits the extent to which these processes can be commented on through this evaluation. Under the previous government there were some changes in policy over the course of this data collection such as changes to Retained EU Law sunsetting deadlines and the introduction of the Windsor Framework. Where possible this has been considered in the analysis of these findings.

Both the proforma data and case study data represent how Common Frameworks were operating at the point in time in which data was gathered. This may differ to how frameworks are operating currently, as frameworks are very much 'living' governance structures. As they progress to being fully implemented, they are reviewed to ensure they are as up to date as possible and have been updated by teams over the last couple of years to reflect operational requirements. The updated versions are published once scrutiny is complete and they are approved by ministers. Post full implementation, any more significant amendments will be taken through the periodic review process.

1.3   Report structure

The report is structured around the key topic areas explored in this research. It will begin by examining governance within frameworks (Section 2), before exploring collaborative working (Section 3), managing different policy approaches (Section 4), and disagreement and dispute management (Section 5). Within each section, findings were drawn from both the proforma and case studies. The report then draws together insights from the research in the conclusion (Section 6). Annexes at the end of the report contain supplementary information on the methodology used in this research.

---

[2] It was not possible to organise an interview with a Scottish Government official within the Public Procurement case study due to resource constraints within the framework team at this time.

[3] At the time of the evaluation being conducted there has only been one framework (Resources and Waste Framework) that had interacted with the UK Internal Market Act exclusions process and there have been no disagreements that have been escalated through all levels of the formal dispute management processes. The Resources and Waste Framework was not included as a case study framework as relevant activity that would have been covered by the evaluation was not yet concluded at the time of the evaluation, therefore it was not seen as the right point in time to evaluate this. Future opportunities to learn lessons from this framework will be considered, including in any future evaluation.

2 Governance

This section covers how governance processes have been implemented within frameworks, considering aspects that have been working well, as well as challenges. It also discusses how regularly frameworks are reviewed.

2.1   Implementation of governance processes

The proforma responses showed that most frameworks have arrangements in place and operational for:

- Governance
- Decision making
- Accommodation of different policy approaches
- Dispute management
- Framework reviews

Returns mentioned that there are framework groups and regular meetings in place to provide this governance and help ensure close working between governments. Only 4 frameworks stated that governance arrangements or decision-making processes had not been operationalised. Three of these did have some processes in place for managing different policy approaches and there was only one where this was not the case.

Most proforma responses suggested that there had not been governance arrangements in place prior to frameworks being established. However, in some instances there was pre-existing joint working between the four governments within these policy areas.

Case study example: Plant Varieties and Seeds Framework

In the Plant Varieties and Seeds Framework, officials commented that there was a lengthy history of joint working and information sharing in this policy area.

Most governance structures of the framework were in place prior to the framework being introduced. In this case, officials felt it was difficult to attribute any new successes or failures within this space to the Common Framework itself. However, the framework had been helpful in formalising these processes.

"[The structures have] been here since '64, if not before then, but that's when legally the question was put to ministers do we want to act jointly, particularly for the variety testing." (Scottish Government official, Plant Varieties and Seeds)

"I would suggest that the framework hasn't really changed any of the processes we already had in place." (Welsh Government official, Plant Varieties and Seeds)

Although most processes were implemented across the frameworks, officials felt that the frameworks were still relatively new and that the processes had not been fully tested. There was the sense that it was too early to judge how effectively frameworks were working, even within frameworks that had experienced governments determining different policy approaches. For instance, within the Food and Feed Safety and Hygiene

Framework, divergence had been managed in relation to the Precision Breeding Act. However, this was an area that developed outside of the framework and therefore was not seen as a full test of processes. Despite this, there still tended to be confidence among officials that ways of working were effective.

"It's hard to say without having been exposed to all the policy workings or to any issues, but there's nothing I'm really concerned about [right] now." (Food Standards Agency Northern Ireland team official, Food and Feed Safety and Hygiene)

"It hasn't really been tested in that way. We haven't had anything that's gone really badly wrong, and we've had to deal with it.... it's not quite been tested in an extreme circumstance yet, but as far as I'm concerned, it works pretty well." (Scottish Government official, Agricultural Support)

2.2   How meetings have been operating

The proforma data showed that within most frameworks there were regular meetings between officials within each of the governments. Figure 2.1 below shows the number of regular meetings across frameworks. The frequency of the meetings varied between frameworks – a plurality of frameworks met at least once a month. Across all meetings, it was reported that all governments who were party to the framework were attending. There were also some cases of ad hoc meetings that had been set up when required in response to emerging issues. Only one (BEIS) framework recorded that the framework had no fixed cycle for meetings.[4]

Figure 2.1: How many regular meetings each framework has
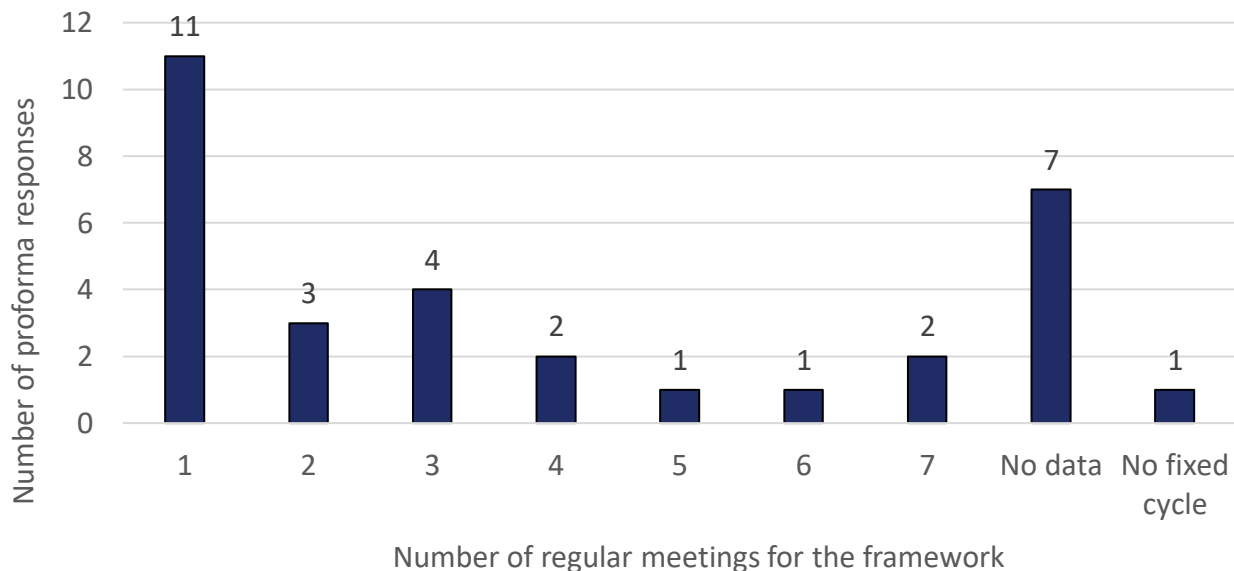
Base – 25 frameworks that provided data via the proforma on meetings that take place as part of the framework.

---

[4] Data was gathered before this department (Department for Business, Energy and Industrial Strategy) was replaced by DESNZ, DSIT, and DBT as of the 7th February 2023.

The frequency and number of meetings seemed to reflect the level of activity in a framework in relation to divergence. For example, the Commercial Transport and Operator Licensing Framework had one regular monthly meeting in place between governments, as was typical for some other Department for Transport (DfT) frameworks. Meanwhile, the Department for Health and Social Care (DHSC) and Department for Environment, Food and Rural Affairs (Defra) frameworks had more meetings in place, with DHSC frameworks expecting the most future regulatory differences. This suggests responsiveness in determining the level of governance based on the levels of activity anticipated within the framework, with those that were actively considering policy meeting more often than those that were not.

Within the case studies, officials fed back on how effective they felt these meetings were. For instance, within the Agricultural Support Framework there were several different groups which met at different frequencies, serving different functions. These included a regular Policy Collaboration Group (the principal working level group), Cross Border Group, the UK Agriculture Market Monitoring Group (UKAMMG), and a further regular working level catch up every few weeks as a keep-in-touch meeting. The co-ordination of activity between these different groups was seen as working effectively.

"I think communication in general... knowing that there is that formal structured route that issues can be raised, or things can be discussed [and] having that regular opportunity for senior management from all the administrations to get together and discuss these issues is really helpful." (Scottish Government official, Agricultural Support)

2.3 Aspects of governance working well

Formalising structures

Officials across the case studies reflected that frameworks were helpful in formalising working between governments. Frameworks were seen as a commitment that governments would work together in framework areas, setting the expectation for cross-government engagement and providing processes to ensure this happens. This includes providing clarity for those less familiar with frameworks such as new staff or those external to the frameworks. Having formalised processes was seen to be useful even where relationships had been good prior to the introduction of frameworks. Officials also felt there were clear mechanisms in place if any issues arise.

"I think for me the good thing about frameworks is it puts in place an understanding that we will do this…with the whole governance around this and the whole commitments and the framework it gives a bit of teeth and a good underpinning to continue the relationship." (UK Government official, Commercial Transport and Operator Licensing)

"The positive [is] knowing that we have the structure there to fall back on, so it kind of gives more confidence that things are being dealt with appropriately in the structure." (Food Standards Agency Northern Ireland team official, Food and Feed Safety and Hygiene)

> **Case study example: Best Available Techniques Framework**
>
> Good pre-existing relationships within this framework were mentioned. However formalising governance processes was also seen as useful as it had brought engagement *"into an agreed format that ensures that we meet routinely"* (Welsh Government official, Best Available Techniques)
>
> From an external perspective the external stakeholder interviewed highlighted that having formalised processes was helpful in providing transparency on how this policy area would be managed effectively by the governments.
>
> *"Definitely you get a sense of more joined up working. There's processes and frameworks set which almost makes that happen."* (External stakeholder, Best Available Techniques)

Flexibility of Common Frameworks

Although Common Frameworks are formalised governance arrangements, respondents felt they could be flexibly adapted within different policy areas. In practice, this is demonstrated by the varied governance structures that have been implemented to manage different policy areas with different levels of activity. Within the Commercial Transport and Operator Licensing Framework, it was felt that flexibility in framework governance has worked well in setting appropriate levels of governance, and that it was right that frameworks were not overly prescriptive in this.

"It's a flexible agenda that covers things either we or they have noticed that might need consideration." (UK Government official, Commercial Transport and Operator Licensing)

"There's been communication on the formal level and on the informal level and that's actually worked very well so far." (Welsh Government official, Agricultural Support)

Where substantial wider issues have emerged within a framework area, some have set up specific groups to discuss these areas, as it was felt to be important that there were dedicated spaces for discussion. For instance, the Plant Varieties and Seeds Framework did this to consider the impact of the Precision Breeding Act. This illustrates how frameworks can be responsive to external issues which have an impact on framework policy areas.

"So within the context of our relationship in the framework, we raised those things, and we had a subgroup about subsidy control for quite some time because we had real, serious concerns about how it applied to agriculture." (Scottish Government official, Agricultural Support)

2.4   Challenges in relation to governance

Whilst the framework has impacted working in policy areas in many positive ways, there were some challenges to effective governance within frameworks.

Resource constraints and knowledge retention

Across the case studies, internal resource was raised as a barrier to different framework activities such as monitoring cross-cutting issues, risk-assessing the impact of potential areas of divergence, and conducting stakeholder engagement. This was particularly a barrier for devolved governments in being able to participate as actively as UK Government officials within the frameworks. These constraints were seen as being exacerbated when teams have to respond at pace, and therefore there was less flexibility in how this limited resource is utilised.

"Sometimes you can get the feedback let's just look, yes, absolutely we need to do this, but we can't do it at the moment. So it's not working as smoothly as possible, but the only way you fix that is with the extra resource." (Food Standards Agency Northern Ireland official, Food and Feed Safety and Hygiene)

"We are better resourced in comparison to the other nations, but we're still quite a small team…I think we're relied on to be that engine room for not only servicing all these meetings…also coming up with a lot of thinking too…if the devolved administrations were better resourced…then that would make things work even better." (UK Government, Agricultural Support)

Alongside resource issues, staff turnover was mentioned as a challenge for knowledge retention in frameworks. Maintaining knowledge and experience in the frameworks was seen as important for supporting effective working between framework officials. It was noted that *"frameworks are only as good as the people that use them"* (Scottish Government official, Plant Varieties and Seeds) which highlights the importance of being able to retain knowledge and experience when people move on. It was felt there could be more effective processes to support with this. Considering how to better retain knowledge could be an area of improvement going forwards.

"High turnover of staff is an area of concern…I think one area to improve would be having a better process in place to make sure we can continue to make sure that all of the people have an understanding of what the processes are." (Food Standards Agency Wales team official, Food and Feed Safety and Hygiene)

Unequal relationships between framework parties

Within the case studies, UK Government tended to be viewed as having more weight in framework discussions. Illustrative of this, the proforma data showed that although the decision on chairing of meetings and agenda had to be jointly agreed, most meetings across frameworks were chaired by UK Government who would also take the lead in setting the agenda.

"We can input into the agenda everything that we wish to discuss." (Welsh Government official, Agricultural Support)

"The agenda is populated quite heavily by Cabinet Office… and I think it would be good to see more of what's going on in other nations." (UK Government official, Public Procurement)

Resource constraints amongst devolved governments was mentioned as a contributing factor to *"asymmetry"* (UK Government official, Best Available Techniques) in relationships between UK Government and devolved governments. This asymmetry was seen as a potential challenge to framework working by both UK Government and devolved governments. On the UK Government side, this related to having a higher workload. On the devolved government side this meant they were less able to influence direction of travel and contribute to policy development within the framework. It is worth noting that one UK Government official within the Best Available Techniques Framework caveated that these asymmetries were not a framework-specific issue. However, this may impact the extent to which frameworks are viewed and able to operate fully as four-way mechanisms.

"There is a tendency for UK Government to view [that] their positions are the point from which other governments diverge." (Welsh Government official, Plant Varieties and Seeds)

"Everybody is working with limited resource and Defra [Department for Environment, Food and Rural Affairs] are taking the bulk of the work in terms of administration and management." (Welsh Government official, Best Available Techniques)

Slow decision making

There were some references in the case studies to slow decision making as a challenge to progress in frameworks. This was due, in particular, to the need for four-way consensus. 'Decision making' covers a range of levels at which decisions can be made including at working level, senior official level and ministerial level. In one case, an external stakeholder felt that decisions take longer than prior to framework introduction because there are additional layers of decision-making to go through. Another official raised that there had not been many decisions reached through the framework. Resource was again seen as a factor here, but also infrequent meetings that were seen as more focussed on discussion about policy development than decision-making.

"I would say that maybe there's one negative for us, that it does seem to have created more layers of decision making. So I think in some areas it slowed down the decision process." (External Stakeholder, Plant Varieties and Seeds)

On the other hand, it was noted that there is often complex and technical information that needs to be considered in these decisions which takes time to process.

"We do need it [the Air Quality Governance Group] but we haven't really got to the point where we've made one decision, where we've agreed one [decision] that is okay to go forward to ministers in 4 years. It's an effective policy forum, [but] it hasn't really been tested as a governance structure." (Scottish Government official, Best Available Techniques)

2.5   Framework reviews

Within the proforma, teams were asked how regularly frameworks were reviewed. A plurality (12) answered that their Common Framework is reviewed every 3 years in line with the standard length of time required for framework review. The other frameworks who responded had more frequent reviews planned – yearly (7 frameworks), every 6 months (2) or quarterly (1). Only one framework, which was not very active, indicated there were no reviews of the framework currently planned.

There were reviews mentioned within case studies, which seemed to be beneficial to the continuous improvement of frameworks. For example, within the Commercial Transport and Operator Licensing case study, the periodic review of the framework was mentioned to check it was fit for purpose, and within the Plant Varieties and Seeds Framework there was an annual meeting to review the previous year of work under the framework, with the review of framework operation itself taking place initially after 6 months and then every 3 years.

"We also have an annual meeting between the Plant Varieties and Seeds Committee and the National Lists and Seeds Committee, and a large part of that is a review of the previous year, but also a bit of a horizon scanning forward look to the next year and our priorities and which things are on the agenda and kind of keep an eye on what's happening across the board." (UK Government official, Plant Varieties and Seeds)

"No document remains standing in life forever, everything needs to be reviewed and updated, so obviously that's one of the good things about [the framework]." (External Stakeholder, Best Available Techniques).

Several officials in the case studies felt there could be greater clarity on their frameworks' scope and how these fitted into wider policy areas. Reviews may be beneficial in considering if the scope of a framework can be clarified.

"I think our food and feed one [framework] is quite high level and quite high principled and you have to go to other documents to get the detail, and that's when people looking cold at it might not necessarily understand that certain things do fall within the remit of the framework." (Food Standards Scotland official, Food and Feed Safety and Hygiene)

3 Collaborative working

The following section discusses how effective collaborative working has been on the frameworks programme between teams, specifically in relation to communication, information sharing and joint working. As part of this, stakeholder engagement and wider awareness of Common Frameworks are also considered.

3.1 Communications

As was covered in the previous section, levels and frequency of meetings differed across frameworks. Nevertheless, the proforma data showed that officials felt levels of communication were "about right" across most frameworks, suggesting some satisfaction with how frameworks are supporting communication. There were only 5 frameworks where one government or more had responded that they felt communication was "a bit too little". The case studies provided more detail on how officials felt communications were working within the frameworks.

Across case studies, officials mentioned that the fact that frameworks are non-legislative and allow for informal, as well as formal communications, can be beneficial in ensuring that there are *"open and frank"* (Scottish Government official, Agricultural Support) conversations at official level. This was seen by some to reduce tension and increase trust. This can take the pressure off interactions and allow officials across all governments to share their views, facilitating constructive, open discussions, particularly around more difficult issues.

"If there's a new policy being developed, then we all get together as one to formulate that, and it means then that we've solved problems as we go." (Food Standards Agency UK team official, Food and Feed Safety and Hygiene)

"I feel the communication between the groups is really good and we have been given opportunities as devolved administrations to discuss issues as well, so I have no complaints or negatives about the level of communication at the moment." (Northern Ireland Executive official, Best Available Techniques).

"We talk to all the governments, we regularly meet with all the regulators...but I think the key is that it's [the framework is] a much more efficient way of doing it [communicating] when you've got everyone around the same table or even around the same laptop to talk about the same issues." (External Stakeholder, Best Available Techniques)

Case study example: Public Procurement Framework

The Public Procurement Framework officials noted that there had been improved communication in this area as a result of the framework being established. This was an area where there had not been as much communication prior to the framework being introduced, so the framework was seen as helping to facilitate this. Previously policy working in this area had been more siloed. Contact between government officials had moved from being a maximum of once or twice a year, to regular monthly meetings where teams could discuss work.

"It's an option now to check with other jurisdictions what their thoughts are, what existing policies they have in something, where previously we wouldn't have done that."
(Northern Ireland Executive official, Public Procurement)

"Before the framework… you might not even know that it was different in Northern Ireland or Scotland or England, you'd do your own little thing." (Welsh Government official, Public Procurement)

Case study example: Commercial Transport and Operator Licensing Framework

The Commercial Transport and Operator Licensing Framework was a less active framework in terms of the number of meetings and level of divergence; however, officials felt communications were the right level in allowing them to be *"reactive"* and meet more regularly when required.

For instance, when the framework was first being set up at pace and when discussing potential divergence relating to changes to driving certificates.

Most conversations and decisions were happening at official level between the governments, which was seen as the right approach, considering they have the expertise in this policy area.

Communication challenges

During the course of the evaluation, officials raised some communication challenges. These tended to be more practical as opposed to fundamental issues with the framework processes themselves. For instance, there were cases where some parties felt that communication had been too slow which meant officials did not have enough time to respond. It was acknowledged that this was sometimes due to external factors, such as a change in Ministerial priorities and it was felt that it was important that this consultation happened even if timings for review were tight.

"Sometimes it will be…by the end of tomorrow or the day after tomorrow and we don't have time to analyse what they've sent to us and certainly we don't have time to put advice to the Minister on our side about it. I think that has been the only issue that we've had so far, but I think that's potentially something to do with changing ministerial priorities in the UK Government that can sometimes affect what needs to be worked on and the time scales that they need to be finished by." (Welsh Government official, Agricultural Support)

"It has changed, during the development of the frameworks there was a lot of intense backwards and forwards….and I think it's fair to say it has really died down…and I think that is largely down to the resource capacity in Defra." (Scottish Government official, Best Available Techniques)

3.2   Information sharing and joint working

Most responses to the proforma across governments were that Common Frameworks had led to greater information sharing and joint working at least "to some extent". Figure 3.1 shows proforma responses to what extent frameworks have led to more joint working and greater information sharing. Within the case studies, frameworks were described as encouraging information sharing, positive relationships, and facilitating joint working by providing a space where all governments can come together and share what they are working on.

Figure 3.1: The extent to which frameworks have led to more joint working and greater information sharing (by government)
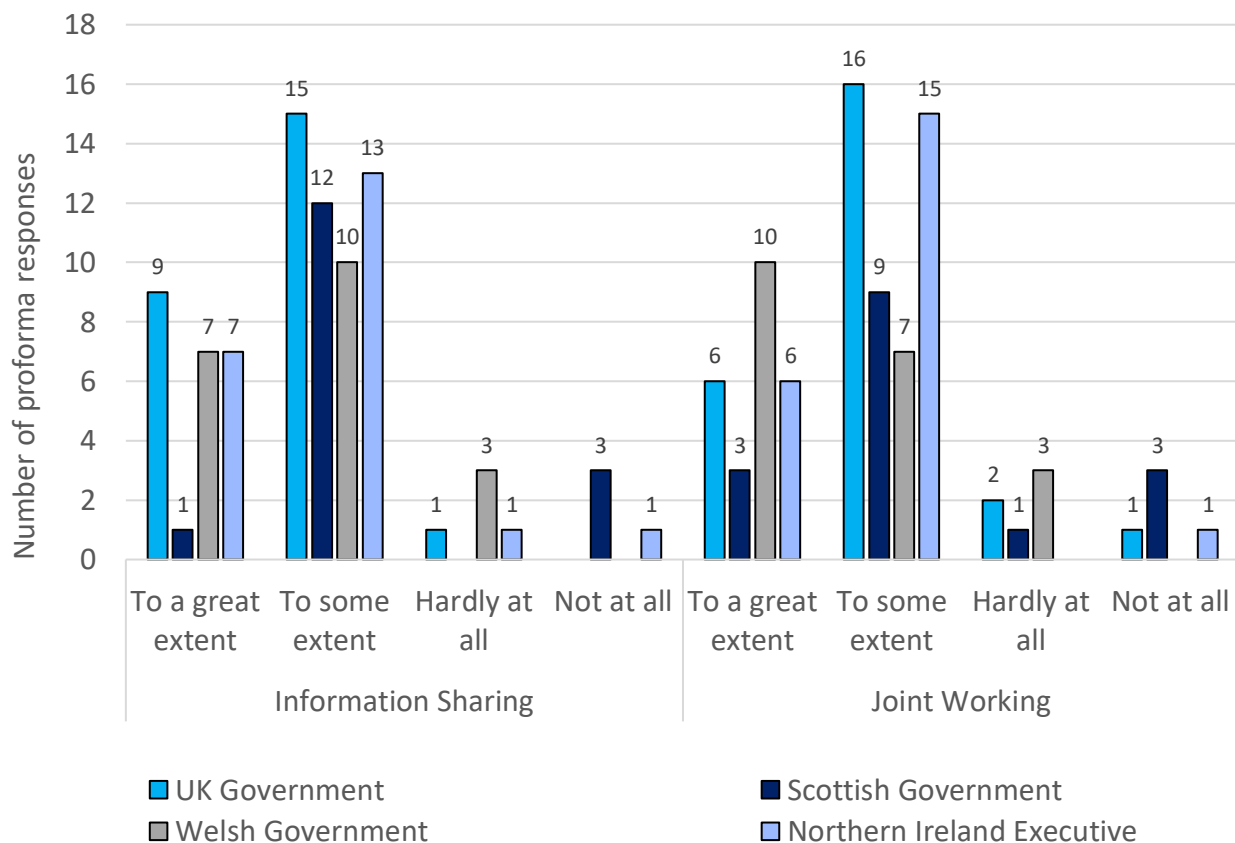
Base: 25 UK Government, 16 Scottish Government, 20 Welsh Government and 22 Northern Ireland Executive returns who provided data via the proforma on the extent to which their framework had led to more joint working and information sharing.

Building positive working relationships

Across case study frameworks, some officials said that positive working relationships had been built between officials, while others noted that there had been good existing relationships but the frameworks continued to support these. Some commented that this has created the right environment for navigating more challenging topics, as officials felt comfortable discussing their concerns.

"We've built relationships from the framework… there's always the same people who go to the framework meetings… So if you have an issue, you've got a contact that you go and talk to." (Welsh Government official, Public Procurement)

"It's a relationship that's been developed over the years before there was a framework, but the framework makes us more alive that we should keep this relationship and there's a very good reason why we do have it." (UK Government official, Commercial Transport and Operator Licensing)

In some cases, relationships have been extended further than the frameworks themselves, helping to expand networks between governments.

"We're often passing over contact names, so they're getting in touch outside of the meetings and not necessarily with us or, but we're providing those sorts of contacts so they can join up for collaboration." (UK Government official, Agricultural Support)

Effective information sharing

Officials said that they were using frameworks to share information on what they were working on and where they were up to, to support better policy making. This included sharing learning, new ideas, and bringing issues to framework groups. The Commercial Transport and Operator Licensing and Plant Varieties and Seeds Frameworks mentioned specific examples of information sharing in relation to actual and potential areas of divergence. There were also some examples of upskilling through the frameworks through bringing in external speakers on relevant issues like Retained EU Law reform and running skills sessions on areas like the World Trade Organisation processes.

"I think the avoidance of divergence, it's just keeping us in with each other, and having those discussions, on making sure we have that relationship and we're aware of what other side is doing. It's just as long as that continues then both sides are sighted on any changes that may or may not lead to a divergence and can act accordingly." (UK Government official, Commercial Transport and Operator Licensing)

Positive joint working

Joint working was mentioned as facilitating decision-making in frameworks. Specific examples were provided within each of the case studies. This ranged from practical areas such as UK Government sharing resources with devolved governments which ensured work could be delivered and was not duplicated, to produce joint guidance on common areas of work.

"We've made a few small decisions and I would say I have been very actively involved in all those decisions because we cannot progress as on a UK basis unless all the nations agree. So in that sense, the governance structure does work on the few decisions we've made." (Scottish Government official, Best Available Techniques)

Case study example: Agricultural Support Framework

On the Agricultural Support Framework – where there had been more activity in terms of policy differences to date - there were several good examples of information sharing and joint working mentioned, including creating links beyond those that just worked on the framework itself. For example:

- Regular meetings of the UK Agriculture Market Monitoring Group were used to share data and insights to make sure any schemes implemented do not have adverse effects on the other nations.

- Officials mentioned using their framework contacts within Defra to link them up with colleagues who could support Scottish Government officials with work on flooding that needed to be carried out at pace.

- All officials within the framework mentioned that an in-person away day they had held had been particularly good joint working and relationship building. Bringing people together face to face was felt to be a positive way to build strong relationships and to make wider contacts to pursue different workstreams under the framework. It also gave the opportunity to explore specific issues in more depth and hear different viewpoints. Officials were planning to continue to run this on an annual basis because it was seen to be so valuable.

"We had a meeting yesterday at the Policy Collaboration Group, and our Welsh colleagues were talking about the consultation that they're running at the moment on some future agri[culture] policy and difficulties that they've been having with some of their stakeholder reactions to that…we were able to talk about that." (Scottish Government, Agricultural Support)

"So for example, we had a situation before Christmas in Scotland where - and you'll remember this - the[re was] flooding in October and our ministers were interested in exploring a flooding scheme and it was pretty short notice given the nature of the problem, so I was able to contact my Defra colleagues within the framework and say who on your side would deal with this, can we speak to somebody about what you've done? And they've in turn put me in contact with the right people there. So it's facilitating that joint working, which has been really helpful." (Scottish Government official, Agricultural Support)

"One thing that we have done to try to increase communication on that side is we set up a policymakers' away day. So it's a meeting once a year where officials from each government get together, and the individual policy leads can go to specific breakout groups that are more to do with their areas…and so this format has been what we've done to try and make sure that we're not working too far apart." (Welsh Government official, Agricultural Support)

Challenges to information sharing and joint working

There were a few challenges raised in relation to information sharing and joint working within the case study frameworks.

There were some occasions where information sharing had not been so effective. As with communications, these were not necessarily described as being issues intrinsic to the framework processes themselves. There were a couple of occasions where information sharing could have been earlier and where information had been found out from other means as opposed to through framework meetings. One cause of this was when officials within other UK Government departments were not aware of frameworks and the relationships between governments, alongside being unaware that information should be shared through these routes. Another cause was seen as uncertainty among UK Government officials on what they were able to share with devolved government officials.

There are also times where work between governments could be better co-ordinated. This could entail working at a similar pace and seeking approval from decision-makers at the same time or having joint as opposed to separate meetings with external stakeholders.

"We could definitely get better at working together as four countries to seek decisions from decision-makers at the same time." (Food Standards Agency Wales team official, Food and Feed Safety and Hygiene)

Additionally, there were some wider challenges. For instance, it was noted that official level working within frameworks had the potential to become more challenging when there are higher-level political differences between governments, even if personal relationships between officials are strong. In a couple of cases, it was felt that minor issues had become challenging as a result of wider differences in government views. Also, high levels of staff turnover can make relationship building more difficult, when positive relationships were seen as important to ensure effective framework working.

Case study example: Commercial Transport and Operator Licensing Framework

Within the Commercial Transport and Operator Licensing Framework, officials were slightly more sceptical about the extent to which the frameworks themselves facilitate joint working, and whether this was their purpose. This was a framework were there was relatively little decision-making, or differences in policy approaches anticipated in this area and so giving effect to the full range of framework working-level governance, such as frequent working level meetings, was not seen as needed. For this framework the principal benefit of the framework was the ability to trigger the dispute resolution mechanism if the circumstances required it. It should also be noted that in practice there was close working within this framework.

"I don't think they're meant to facilitate close working. I think that's done at a much lower level. I think that's done at the policy level. And, I think that's down to individual officials, and they're keeping that communication going rather than the framework." (Northern Ireland Executive official, Commercial Transport and Operator Licensing)

"It [the Common Framework] doesn't prevent effective working or get in the way of effective working which is the other side of the coin." (UK Government official, Commercial Transport and Operator Licensing)

Cross-framework working

Within the case studies, there were mixed views on whether greater cross-framework working would be beneficial. Some felt that greater link up between frameworks would be helpful and could be an area for improvement. It was noted that there may be wider policy areas which different frameworks are considering, such as Retained EU Law reform, where cross-framework working or information sharing could be beneficial. This would ensure that appropriate consistent approaches are taken, and learnings and good practice can be shared. Others felt greater cross-working was not necessarily needed.

"If we had an issue with anything that was happening in another framework, then there's no kind of mechanism to dispute that. Because we're not even at the same government department." (Food Standards Agency Wales team official, Food and Feed Safety and Hygiene)

"We're seeing really quite different approaches to how that issue [Retained EU Law reform] is being considered under the three frameworks [covered, or partly covered, by FSA/FSS]…there was no obvious steer or guidance in terms of how to manage that point of consistency across the frameworks." (Food Standards Scotland official, Food and Feed Safety and Hygiene)

It was considered important to make sure any wider meetings added value and took into account that different issues are dealt with within each Common Framework.

3.3   Stakeholder engagement

The evaluation also sought to understand more about the external engagement that has taken place regarding Common Frameworks, including getting the perspective of external stakeholders within relevant industries on how frameworks were operating.[5] We recognise that frameworks have a range of important stakeholders, including legislatures. In asking the question on stakeholder engagement, this evaluation was more focussed on how much engagement took place with industry stakeholders, given the role of frameworks in enabling the functioning of the UK internal market and ensuring the UK can enter into trade agreements.

Low levels of stakeholder engagement

The case study frameworks tended to have had limited stakeholder engagement. Most mentioned that stakeholder engagement had been conducted at the framework development stage, but that there had not been much further engagement. Despite this, officials tended to say this engagement was at the right level. It was seen as important to make sure that any engagement was valuable and therefore was only carried out at appropriate intervals, for example, about specific policy areas or divergence being considered.

---

[5] Stakeholder interviews were successfully carried out for 3 of the 6 case studies. The others had had limited stakeholder engagement and therefore appropriate stakeholders to interview were not identified. It should be noted that this may not be reflective of the level of engagement within other frameworks - data on stakeholder engagement was not explicitly captured via the proforma, but some did mention that they were carrying out stakeholder consultation as additional evidence gathering on divergence.

"I think we're doing a good amount, that's the thing about policy officials, they are always wanting to be doing more and more, but I think we're doing a decent amount." (Food Standards Agency Northern Ireland team official, Food and Feed Safety and Hygiene)

Frameworks were seen as mainly internal processes and therefore that it was not always relevant to consult with stakeholders. One of the stakeholders interviewed said they were unaware of the framework but felt that they had had good engagement with government officials within this policy area generally. Therefore, they were satisfied that they did not need to engage in detail with how frameworks operate. In contrast, there were others who said that there was a desire from external stakeholders for more engagement.

"Whether or not we're [engaging with governments]…in the framework or out of the framework, I feel that we are quite well connected. We know there's an open discussion we've already had, you know, in one policy area we've already had a decision that is absolutely fine in terms of Northern Ireland and on the driver [Certificates of Professional Competence]." (External stakeholder, Commercial Transport and Operator Licensing)

"I think the sort of two-way communication that I've mentioned earlier would be key. I think more regular meetings of the Advisory Board." (External stakeholder, Best Available Techniques)

Two of the case study frameworks had carried out more regular stakeholder engagement and there seemed to be a greater understanding of the frameworks and their purpose from these stakeholders. For example, the Best Available Techniques Framework had stakeholders integrated into different framework groups. This included technical working groups, an advisory board, and a separate regulators group.

Within these case studies, there was still recognition that there could be further stakeholder engagement, with stakeholders interviewed keen for greater information sharing and more joint working with framework teams. Frameworks were seen as a way to engage with governments effectively and to be updated on other wider policy, such as the UK Internal Market Act or Windsor Framework, and how this interacts with the areas they work within.

"Anything from the teams within those governments confirming or giving examples of how [the framework] supports them day-to-day would be really, really beneficial." (External stakeholder, Plant Varieties and Seeds)

Barriers to stakeholder engagement

Resource was mentioned multiple times as a barrier to stakeholder engagement within frameworks, even among those who were doing more active engagement. As frameworks were viewed as mainly internal processes, increasing interaction with stakeholders was not seen as a high priority when resource was stretched. It was raised that devolved governments tended to have less resource available, meaning that any engagement would need to be UK Government-led and so not necessarily a joint piece of work.

"I love getting out there on the ground with the stakeholders...if we had more resource, we could be doing more." (Food Standards Agency Northern Ireland team official, Food and Feed Safety and Hygiene)

In some cases, when officials had tried to do wider consultations, these had received very limited response. One official felt that the lack of response from industry could show that the framework is working, as they would be receiving feedback from industry if they were not satisfied.

"We hear from industry if there's something wrong and that's not very often, if at all. So, we think that everything's running pretty smoothly on that front…" (Northern Ireland Executive official, Plant Varieties and Seeds)

It was suggested that there could be greater clarity about the level of stakeholder engagement that should be taking place within frameworks and guidance for external stakeholders on how they should be engaging with framework. However, any central guidance should not be too prescriptive on this, as different levels of stakeholder engagement are appropriate within different frameworks. Greater stakeholder engagement could support with transparency and visibility of Common Frameworks, but it remains the case that the key purpose of frameworks is to support effective working between governments.

"We are developing some guidance on the Common Frameworks currently – how to practically apply the Common Frameworks. This may be useful for stakeholders. We may be able to use that with service users to explain a little bit more about the framework and how it operates, and certainly that's something that we will be able to share." (Food Standards Agency UK team official, Food and Feed Safety and Hygiene)

3.4 Wider awareness and knowledge of Common Frameworks

Officials interviewed as part of the evaluation were asked about the wider awareness and knowledge of Common Frameworks, within departments and governments, as well as more widely.

Most tended to respond that there was low wider awareness and knowledge of frameworks. Some felt that this lack of awareness has meant that the frameworks were not engaged as early as they could have been in policy development, and therefore should be addressed. Some officials interviewed felt that more generally UK Government could be better co-ordinated when engaging with devolved governments, and that raising wider awareness of frameworks could be a positive way of illustrating how to carry out effective intergovernmental working between governments.

"So the framework has been useful... [when we are asked] what discussions we are having with the UK Government about this, we can point to the framework and say we've got this basis, this communication, we meet regularly and that's been working well." (Welsh Government official, Agricultural Support)

On the other hand, other officials also noted that it was not relevant for those working outside frameworks to understand in detail how they work, and it was important to ensure that any wider integration of frameworks into governments' ways of working avoids introducing any additional governance into framework processes.

Case study example: Food and Feed Safety and Hygiene Framework

Officials working within the Food and Feed Safety and Hygiene framework felt that there was quite good awareness and understanding of the framework within their organisations more widely (Food Standards Agency/Food Standards Scotland). It was described as being integrated into wider organisational processes. This was seen as important in case others need to engage with the framework, and for transparency and visibility.

The team had received feedback from both internal and external stakeholders that more information on how the framework operates would be helpful. Officials were working together to produce practical guidance for policy officials outside of the framework, with clearer information on the frameworks and how they work.

"We're producing guidance as the Framework Working Group... it's not fully developed yet; we're still working through it, but it gives you an idea of the types of things that we are doing to try and make life easier for colleagues to comply with the Common Framework requirements." (Food Standards Agency UK team official, Food and Feed Safety and Hygiene)

"Other folk don't necessarily know what the framework is and how it how it affects them and day-to-day life. If you're involved in technical policy, it is affecting you in day-to-day life, but you just might not know it. So we just want to try and make that a little bit more visible and to all parties so they understand the governance arrangements for the framework and what might happen if you go down a certain path that leads to an outcome that others are not sighted on for example." (Food Standards Scotland official, Food and Feed Safety and Hygiene)

4 Managing different policy approaches

This section examines how effective frameworks have been at managing different policy approaches – processes that are in place to do this, as well as the extent to which different approaches have emerged to date and are expected in the future. It also covers tracking and monitoring of any differences and other cross-cutting issues.

4.1   Processes

The proforma data outlined processes for managing areas where the governments intended to take different policy approaches across the frameworks. These tended to refer to discussing this at meetings or through framework groups, the importance of joint consideration between the parties, and the principle that any government can suggest changes. Proforma returns referenced that where agreement through these processes could not be reached, the formal dispute resolution mechanism could be triggered as a last resort.

"The framework principles for working together set out a process by which any government can suggest changes to the standards and how such a proposal will be collectively considered before one or more governments introduces a change. This will allow for necessary divergence by one or more governments as required." (Department of Health and Social Care Framework, UK Government proforma return)

"[The framework is] providing the flexibility for divergence within the joint arrangements." (Welsh Government official, Best Available Techniques)

Within the case studies, most officials commented that they felt confident there were clear and effective mechanisms in place to manage divergence, even where it was also mentioned that these processes may not have been fully tested.

Confidence these processes reduced the likelihood of uncontrolled divergence

As part of the proforma, respondents were asked the extent to which they felt joint working through the framework reduced the likelihood of uncontrolled divergence occurring, a key purpose of the frameworks. The majority of responses across frameworks and governments were that they had, at least "to some extent". Figure 4.1 shows the number of proforma responses on whether joint working introduced by frameworks has reduced the likelihood of uncontrolled divergence.

Figure 4.1: The extent that joint working introduced by frameworks has reduced the likelihood of uncontrolled divergence (by government)
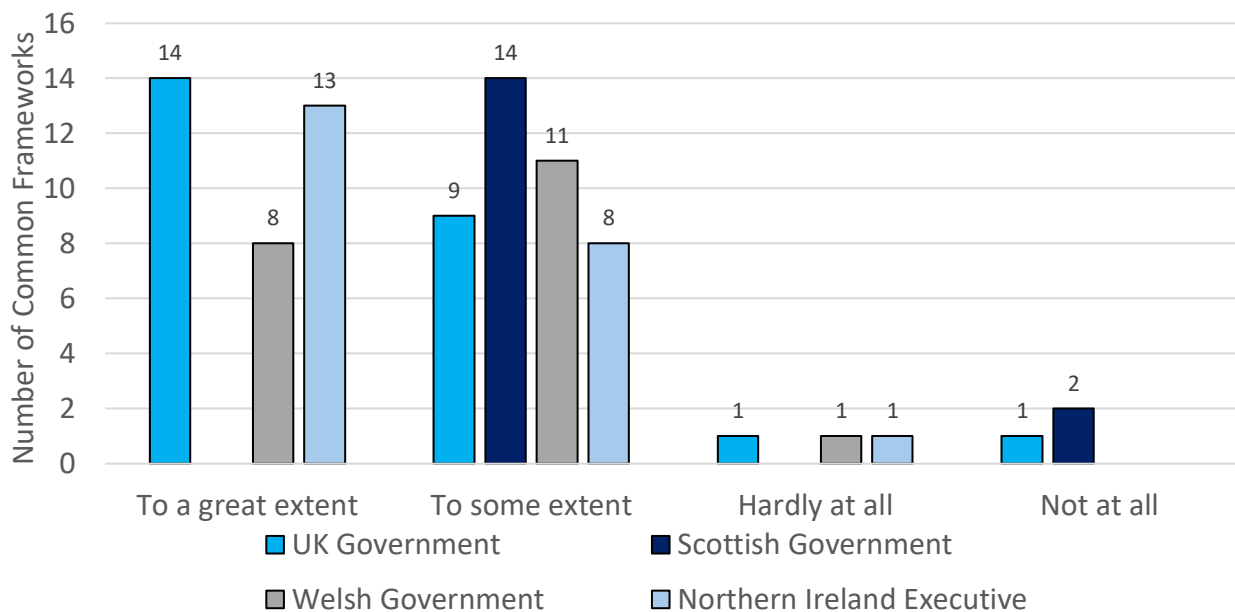
Base: 25 UK Government, 16 Scottish Government, 20 Welsh Government and 22 Northern Ireland Executive returns who provided data via the proforma on extent framework reduced the likelihood of uncontrolled divergence

The feedback through the case studies echoed this, with officials saying that good relationships, communication, and increased joint working has helped reduce the likelihood of uncontrolled or unexpected divergence occurring whilst supporting differing policy approaches where preferred.

"*It would be hard to understand, what it [unexpected divergence] might be and how it would manifest itself.*" (Food Standards Scotland official, Food and Feed Safety and Hygiene)

"It would be a managed divergence rather than something that just happened." (Scottish Government official, Best Available Techniques)

4.2   Divergence experienced to date

In order to understand how effectively frameworks have been managing divergence, it was important to capture the extent to which frameworks had dealt with different policy approaches to date. Levels of divergence varied between frameworks. In the proforma returns seven frameworks listed at least one area (the number ranged from one to eight).

There were some areas of different policy approaches being taken across the six case study frameworks. This ranged from what was seen as relatively minor divergence where EU legislative changes resulted in different approaches between GB and Northern Ireland, to bigger legislative changes such as the Procurement Act and the Genetic Technology (Precision Breeding) Act.

Within the case study interviews, it was clear that even among frameworks where governments had been considering different approaches, there was the perception that the frameworks' ability to handle this had not been fully tested. It was often seen as being in the early stages or not substantial enough to judge how effective these processes had been. Despite officials mentioning good information sharing and joint working in some areas, there was uncertainty about what the impact would be when this was fully operationalised.

"There are differences between our approach[es]…We may not fully realise the divergences and effects of the divergence until they start to become operational in the next year or two." (UK Government official, Agricultural Support)

"There might be more divergence as we go forwards with the new procurement rules and Scotland doesn't. But what impacts that is going to have, I don't know." (Welsh Government official, Public Procurement)

Some of the current different regulatory approaches being discussed in the case studies were areas external to the frameworks themselves, such as the Precision Breeding Act. This interacted with the Food and Feed Safety and Hygiene and the Plant Varieties and Seeds case study frameworks. Legislation like this was seen as presenting some additional challenges for frameworks in terms of fulfilling the framework criteria around early sharing of information because it was not immediately obvious it engaged any single particular framework (as there was no active Common Framework for Precision Bred – or even Genetically Modified – Organisms) and this rendered the appropriate channel less clear. Therefore, it is essential for governments to be thinking through these sorts of questions at an earlier stage where possible and to be reacting more quickly in areas such as this. This includes taking a pragmatic approach to information sharing even in situations where processes are not absolutely clear. Wider awareness of frameworks within governments could be one way to ensure that framework processes and relationships are utilised earlier.

There is no specific protocol for cross-framework working. There could be further consideration as to whether there is anything that could support with better cross-framework working with policy areas that overlap between frameworks.

"[The Precision Breeding Act is] a big piece of work that is going to take [Defra] a lot of time. We are also going to have to be involved in at least some of this work. It's going to take resource to follow this work, check we are happy with the approach, work on amending shared legislation. This is extremely challenging when resources are already very limited." (Welsh Government official, Plant Varieties and Seeds)

"[The Precision Breeding Act has] been the one example we've had where we don't think frameworks really have operated as we would have expected, because really it was a decision that was made by UK Government that we're going to press ahead and develop and then implement precision breeding proposals." (Food Standards Scotland official, Food and Feed Safety and Hygiene)

"We did engage with the Food Compositional Standards and Labelling [Common] Framework for precision breeding because there were lots of questions raised about labelling requirements…it was easier for us to do because we're party to both of the

frameworks so it was easier to kind of match us up." (Food Standards Agency Wales team official, Food and Feed Safety and Hygiene)

Case study example: Plant Varieties and Seeds and Food Feed Safety and Hygiene Frameworks

Both the Plant Varieties and Seeds and Food and Feed Safety and Hygiene Frameworks were fairly active frameworks in terms of differences in policy approaches they had experienced. Both interacted with the Precision Breeding Act.

Despite initial challenges, in relation to a lack of early information sharing on this area and the legislation interacting with multiple frameworks, there was more positivity about how frameworks were responding at the time of the evaluation. For example:

- Plant Varieties and Seeds: it was noted that discussions were in early stages and there was hope that the framework processes would be utilised more going forwards for communications between governments on the Act. Separate meetings had been set up as part of the framework to ensure that there was enough time to discuss this topic in detail.

"Separate monthly meetings are held with the DAs [Devolved Administrations] to discuss secondary legislation and implementation relating to the Genetic Technology (Precision Breeding) Act 2023. This is a complex issue and hence merits its own subgroup." (UK Government official, Plant Varieties and Seeds)

- Food and Feed Safety and Hygiene (where the case study had been conducted at a later time point): officials interviewed felt this showed good working within this framework as they were collaborating to create a subordinate Precision Breeding Regime to manage the wider impacts of the Act, for instance, considering UK Internal Market Act implications.

"I don't think we've got a kind of an example of bad divergence yet, because like I said, I think even precision breeding, which was difficult…how we've implemented, what we need to do for Precision Breeding I think is a good example of how frameworks can work." (Food Standards Agency Wales team official, Food and Feed Safety and Hygiene)

The Plant Varieties and Seeds framework had also dealt with a few other internal areas where governments were looking to take different policy approaches at the time of data collection. It was felt that there had been some good information sharing on these.

"There have been instances where information sharing has been good. For example, both Defra and Scottish Government have diverged from the previous approach on organic heterogenous material. Defra engaged us reasonably early on in their policy process and have kept us informed of their progress. Scottish Government have done the same." (Welsh Government official, Plant Varieties and Seeds)

"We usually come to a general consensus. There have been some cases of divergence, but a lot of the decisions that have been made after discussion…we would all come to the one decision." (Northern Ireland Executive official, Plant Varieties and Seeds

---

4.3 Anticipated differences in future policy approaches

In order to understand the intended use of frameworks in the future, and to include a range of frameworks in the case studies, anticipated levels of future divergence were captured in the proforma. There was a higher level of future divergence anticipated – 19 of the 28 frameworks that returned a proforma listed at least one potential future area of divergence. This was also reflected in the case study frameworks with most anticipating varying degrees of future divergence. For example, Agricultural Support officials noted that there was likely to be divergence on subsidies or payments to farmers as governments were considering slightly different approaches. To date, divergence had been minimal while devolved governments were still developing their schemes.

Food and Feed Safety and Hygiene Framework officials identified several areas where it was felt there could be divergence in the future – for instance, where governments may take different approaches to Retained EU Law. Generally, officials felt confident about the frameworks' ability to manage these areas of divergence. What was seen as more challenging to respond to were policy areas that are external to the frameworks, as teams would not always be able to plan for or anticipate these areas of divergence.

"The farming reforms schemes, the other countries aren't really at the same stage of implementation as they are in the UK [Government] so at the moment it's really about understanding what their proposals are and the potential for future divergence." (UK Government official, Agricultural Support)

On the other hand, there were some areas where it was felt future divergence was not so likely. For instance, large scale areas of divergence on the Commercial Transport and Operator Licensing Framework were not anticipated, because it was important that the Trade and Cooperation Agreement was maintained. Within the Best Available Techniques Framework, the UK Government official felt that there was an "emphasis on consensus" (UK Government official, Best Available Techniques).

Additionally, in some areas it was felt that the desirable outcome from the perspective of one or more parties would be to take the same approach across the UK. For example, in response to the proforma, a Defra UK Government framework return responded *"divergence [in this area] would…[be] costly and complex within the UK. It could also affect the UK's ability to meet international obligations making trade deals difficult"*. In areas like this a framework's approach to managing divergence may lean heavily towards how to minimise divergence in certain respects and inculcating a uniform approach. This illustrates how managing different policy approaches within frameworks may mean different things in relation to different frameworks. The possibility of this is included in the Common Frameworks principles themselves – whilst Common Frameworks are designed to foster common approaches, they do also acknowledge policy divergence.

As levels of divergence have been somewhat limited it would be worth further evaluation at a later stage to examine whether frameworks are working effectively in these different contexts; there is the potential that this could create a source of tension within frameworks where some governments feel a consistent approach is most beneficial and others want to pursue divergence.

Tracking and monitoring anticipated divergence and wider cross-cutting issues

Most frameworks provided information within the proforma returns on additional evidence gathering they were doing to track divergence. Those who were not carrying out any tracking tended to be those who were not experiencing or anticipating divergence. Within the case studies, framework officials were asked about tracking of divergence and wider cross cutting issues, as different frameworks had different areas that may interact with their framework, such as Retained EU Law or the UK Internal Market Act, as well as framework-specific areas.

A key method of tracking divergence was seen as discussing it at an early stage within framework group meetings. Some case study frameworks also mentioned specific tracking processes in place within their teams or wider processes within their government or department that they would feed into.

"We monitor what's happening across policy teams at the FSA…to keep a check on what's happening and what could potentially lead to divergence." (Food Standards Agency UK team official, Food and Feed Safety and Hygiene)

"Big issues, things like the [UK] Internal Market Act …they're tracked centrally, and we feed into a central tracking process." (Scottish Government official, Best Available Techniques)

Even among those that did have processes in place, there was a feeling among some that there could be more formal divergence tracking within their framework. For example, ensuring that there were shared processes in place between governments, as well as internal processes within each government that framework teams fed into. There were some differences in reported quantities and areas of future divergence between governments within individual frameworks, which may suggest that there could be greater join up here. Resource was seen as a barrier that limits how much forward planning can be done. It was felt this could become a bigger challenge as the amount of divergence that has to be managed within frameworks may increase in the future. It was not seen as possible to anticipate all future divergence that may occur.

Tracking divergence may be an area which could benefit from wider sharing between frameworks on what processes are most effective. Though one official reflected that it was right that frameworks are not too prescriptive on what these processes look like, reflecting that different frameworks operate in different contexts and therefore different processes would be appropriate.

"I think part of the issue - and I don't know whether this is really a framework issue or not - is that we don't really seem to have a plan…and it would be very helpful if we were a bit more structured and if the framework could help us in that regard…" (Welsh Government official, Plant Varieties and Seeds)

Case study example: Agricultural Support Framework

The Agricultural Support Framework was one of the more active frameworks in terms of levels of differing policy approaches between governments. There were processes in place for tracking this.

Officials across governments within the framework mentioned centralised and framework specific processes that were used to monitor any anticipated differences in policies. Internally, one of their key framework groups - the Policy Collaboration Group carried out horizon scanning – with a standard agenda item for the group being a shared tracker where all governments could add policy developments. This group also had good discussions about wider cross-cutting issues. The framework had also been responsive to bigger emerging issues for example, a specific sub group had been set up to discuss the Subsidy Control Act as this emerged as a prominent issue.

"If there is something major happening I will get an email from the relevant policy lead in Defra…So I think indirectly the frameworks have helped to spur that communication on [other wider issues] and then make it faster than it would be otherwise for the most important issues." (Welsh Government official, Agricultural Support)

However, it was still noted that there could be more shared processes between governments to track upcoming policy areas.

"Within the Agricultural [Support] Framework, I don't think there's a specific process. There is a tracker being developed to cover multiple frameworks at the moment. But yes, in terms of the Agricultural Support Framework specifically... we don't have a particular mechanism." (Scottish Government, Agricultural Support)

5 Disagreement and dispute management

This section outlines processes in place for managing disagreements and disputes within frameworks, how confident officials feel with these, use of these processes to date and anticipated use in the future.

5.1 Implementation of dispute resolution mechanisms

Most responses to the proforma outlined processes in place for handling disputes and disagreements. These would be dealt with through individual framework structures and, where needed, escalated through existing intergovernmental structures. There were only three frameworks which did not mention these processes in their returns. This included one BEIS framework which noted it had not been fully implemented yet and two Department for Transport frameworks which had experienced limited activity at the time of data collection due to lack of potential divergence.[6]

5.2 Confidence in the dispute resolution mechanisms

There has not been much use of these formal processes; however, framework officials interviewed were broadly confident in them. Some caveated that they would not feel fully confident in the processes until they had actually used them in their framework.

Frameworks were seen as useful in establishing clear escalation routes at the right level. Having dispute resolution mechanisms was seen to be a good backup option if communication were to break down. Others referred to the mechanisms as being important in holding framework officials to account for resolving issues. For some, particularly within the Commercial Transport and Operator Licensing Framework where a low amount of divergence activity was anticipated, the main purpose of the framework was seen as managing disputes if they were to occur.

*"So I think it's probably at the right level because you don't want it to be triggered for every little thing." (*Northern Ireland Executive official, Commercial Transport and Operator Licensing)

"Frameworks themselves [are] very helpful and useful to have. [They are] very clear in terms of what they should be doing, very clear in terms of what happens if there's a disagreement all the way to dispute, [it is] useful to see how that would work in practice." (External Stakeholder, Best Available Techniques)

---

[6] Data was gathered before the Department for Business, Energy and Industrial Strategy (BEIS) was replaced by DESNZ, DSIT, and DBT as of the 7th February 2023. As set out in the introduction this data was gathered in Spring 2023 therefore this may not be reflective of current levels of operation within these frameworks.

5.3　Experienced disputes and disagreements

Within the proforma and case studies, there were few formal disagreements and no disagreements that were escalated to the Intergovernmental Relations Secretariat for consideration as formal disputes. We are aware that since data was collected, a number of frameworks have had some further disagreements which have been escalated to and resolved at senior official level. This is in keeping with framework's enshrining of the principle of subsidiarity where disagreements are resolved at the lowest possible level. Within the case studies there were some mentions of *informal* disagreements which had been resolved at lower levels without having to escalate these through more formal structures.

"We have informal disagreements all the time on the matters covered by the framework. And as I say, we've had lots of hard discussions." (UK Government official, Best Available Techniques)

There was one case study framework which spoke about mirroring the dispute resolution mechanisms *"informally"* when there was a specific difference of opinion between government officials on a technical issue, presumably without formal escalation to a higher-level structure. Two framework officials were unhappy that this disagreement, which was highly technical, was dealt with by the general disagreement-management process, which in this instance was not viewed as best placed to provide resolution.

One framework referred to a disagreement on a technical matter relating to fee increases which was escalated to Ministerial level, though some parties did not consider this to be proportionate. The issue was resolved within the framework.

There could be greater clarity on how these processes should be used, as well as what constitutes a formal disagreement and dispute versus an informal disagreement to ensure that consistent approaches are taken across frameworks. Additionally, officials tended to say there were no formal methods for recording disagreements within their frameworks. It could be worth exploring further use of these processes within frameworks and considering whether there are ways to effectively monitor how these processes are being used in the future.

"This is a technical area, and there should be a straightforward technical answer, and that technical answer should be found by the technical people… and in the past, what would happen is where there wasn't an actual conclusion to that, it would go back to the original decision." (Scottish Government official, Plant Varieties and Seeds)

"Try to differentiate between a dispute and a disagreement, because there is disagreeing where we say, well, we're not really happy… but ultimately, it's not causing too much of a problem. And then we've got things that we need to take this to the Ministers because policy in one nation is going to have a massive impact on another, which it actually doesn't happen too much." (Welsh Government official, Agricultural Support)

5.4   Future disputes and disagreements

Officials were asked to provide information in the proforma about disputes they felt could take place in the future. There were 15 frameworks where all government returns did not list any future disputes that were foreseen. In other framework returns there were differences between government responses around whether disputes were expected or not. However, across this data there was no overall pattern in which particular governments or departments were predicting a greater number of future disputes.

Responses on what types of future disputes might be likely tended to refer to broad areas where disputes could arise as opposed to specific disputes officials were planning to raise themselves. For example, the extent to which governments chose different approaches using powers affording under the Retained EU Law Act, as well as speed of reform, was seen as a potential source of tension and therefore had some potential to drive disagreement.[7] The fact that specific areas of dispute were not mentioned suggests that there were not many formal disputes that were planned to be raised in the near future. However, there was also some concern there may be a need for dispute resolution processes within some frameworks in the future, as greater divergence has the potential to cause greater tensions between governments where different approaches are taken. Most disputes were presented as needing time to develop, and it being somewhat difficult to predict whether disputes would occur.

"How quickly the UK Government wants to progress Retained EU Law reform because of the Retained EU Law bill, I think maybe that area [could be a source of disagreement]." (Food Standards Agency Wales team official, Food and Feed Safety and Hygiene)

However, there was still some confidence amongst officials that issues could be resolved without escalating these through the dispute resolution mechanisms. This partly related to officials having successfully resolved issues at official level previously, whereby good relationships made it less likely that formal processes needed to be used.
As with managing futures differences in policy approaches, it was acknowledged that there could be issues that emerge in the future outside of the frameworks and therefore whether future disputes emerged was not fully within officials' control.

"*We've got this really good four nation engagement, really good cooperation between the four nations of the UK so we haven't ever triggered the dispute mechanism in this framework."* (Food Standards Agency UK team official, Food and Feed Safety and Hygiene)

"There's probably enough levers you could pull at official level where you would definitely try before you went down a formal process, and we've done that in other frameworks on other things and we found a resolution because at the end of the day it's in everybody's interest to try and find a way forward." (Scottish Government official, Best Available Techniques)

---

[7] It should be noted that the proforma data was gathered in the period under the previous government where the Retained EU Law Act's approach was to sunset all non-specifically preserved Retained EU Law by the end of the 2023. During passage, this automatic sunset was removed, vastly reducing the divergence risk posed by the Retained EU Law Act. The final case studies were carried out after this change.

6 Conclusions and considerations going forwards

Data gathered through this evaluation has illustrated some ways in which frameworks are working effectively, as well as challenges that frameworks face which may affect their operation. As discussed throughout, some of these challenges relate to wider factors such as political differences, as well as resource levels, which it may not be possible to address. However, this final section reflects on some areas which could be considered to ensure the most effective operation of frameworks going forwards.

Opportunities to share good practice across frameworks

Within the case studies there were some clear examples where frameworks were operating effectively and areas which could be improved. Reflecting on whether there are ways to share learnings across frameworks may be beneficial, particularly on common areas that are being dealt with across frameworks. There were some instances where framework teams mentioned they were looking to produce guidance which could be utilised. Sharing learnings on what works well may be a low-resource approach to support effective working within frameworks, ensuring that teams are not having to come up with new ideas where others have already developed good approaches. These could also support with knowledge retention when officials on frameworks move roles. It may be beneficial to seek views from framework teams more widely on whether this would be helpful and on the best approach to take.

Sharing effective methods for tracking cross-cutting issues and policy areas where different regulatory policy approaches are anticipated could be particularly useful to support good information sharing and forward planning between governments on these areas.

Cross-framework co-ordination

There could be further consideration of whether specific processes would be helpful to manage areas of policy that interact with multiple frameworks, such as the Precision Breeding Act. The importance of pursuing this may depend on the likelihood that policies like this will emerge in the future.

Considering levels of stakeholder engagement within frameworks

The case studies showed that differing levels of stakeholder engagement were appropriate for different frameworks. Some frameworks had lots of engagement with a specific group or groups of stakeholders such as industry expert groups that sit outside government. Others had few direct stakeholders outside of government. Therefore, it is useful for frameworks to not be too prescriptive in what is required in this area, reflecting that the key purpose of frameworks is to support effective internal working across governments. Considering light touch sharing of examples between frameworks where this engagement has been helpful could be beneficial in giving other frameworks ideas of how stakeholders could support on their frameworks.

Increasing wider knowledge and awareness of frameworks across governments

It was noted that, more widely across governments, there was not good knowledge and understanding of Common Frameworks. In some cases, this meant that frameworks were not utilised effectively in intergovernmental working in areas where they could be. There were some areas where it was felt to be better than others, and frameworks were also seen as good ways to highlight intergovernmental working successes between governments. Therefore, it is worth considering if there are ways to raise awareness of frameworks that could support them in working more effectively. Those who work outside frameworks may not need to be aware of how these structures work in detail but raising awareness of them may be a way to improve wider engagement with frameworks where it is required.

Central guidance and monitoring of key framework processes

Central guidance could be helpful to ensure that those who are new to frameworks are given a consistent introduction to how these work. As part of this, it could be worth considering whether wider guidance on specific processes, such as what constitutes a formal dispute, may be helpful to ensure these processes are used consistently.

In addition, it could be worth exploring further how disputes processes within frameworks have been used to date and considering whether there are ways to better monitor how these processes are being used in the future.

Future evaluation of frameworks

This evaluation has provided an initial review of how Common Frameworks processes are working. Future evaluation is recommended to monitor how framework processes are being used over time, particularly to understand how processes which have not yet been used as extensively are working. This could include gathering data from a broader range of stakeholders outside of government.

7 Annex

Annex A: Advisory Group attendees

Advisory Group members are from organisations including the Central Cabinet Office Common Frameworks team; Northern Ireland Executive; Scottish Government; Welsh Government; Defra; Cardiff University; Centre for Public Policy, University of Glasgow; Bennett Institute for Public Policy at the University of Cambridge; and UK in a Changing Europe.

Members who have now left the advisory group due to staff changes were from the Department for Business, Energy and Industrial Strategy, Department for Business and Trade and Institute for Government.

Observers to the Advisory group are from the Office for the Internal Market.

Annex B: Further information on the proforma

Framework teams were given several months to submit the proforma data in early 2023. At least one return was received from all 28 frameworks where returns were expected, with returns submitted by all governments for the majority of frameworks.[8] In total, 26 UK Government, 17 Scottish Government, 21 Welsh Government and 27 Northern Ireland Executive responses were received.

When interpreting findings from the proforma, it is important to be aware that framework teams provided varying levels of information responding to the questions, and that although guidance was provided on how to complete the questions, there is a possibility that some of the questions may have been interpreted differently by different officials. This may have affected the consistency of data provided, whereby for some questions more information, or more relevant information, was provided by some framework teams than others. There were also some frameworks which submitted joint responses.

Joint responses:
There were 5 frameworks which submitted a joint response to this data request, meaning one proforma return was submitted for multiple governments. In addition to this there were 3 frameworks which were not flagged as joint responses but where at least some parts of the responses across governments were identical suggesting that there had been some co-ordination of responses. As part of the data analysis, differences in responses between governments were reviewed – this was not possible where a joint return was provided and within these responses, the individual perspectives of different governments were less clear.

Missing data:
There are 32 Common Frameworks, but proforma returns were only received for 28 frameworks. This is because two frameworks were not included in the evaluation due to these frameworks not being agreed at this stage (Mutual Recognition of Professional Qualifications and Services Directive). The other 2 frameworks, where there are not proforma returns, are the initial case study frameworks (Public Procurement and Plant Varieties and Seeds) – returns were not requested from these teams as similar content was covered within their near-contemporaneous case study interviews.

Table A.1: The number of missing responses to the proforma from each government

	UK Government	Scottish Government	Welsh Government	Northern Ireland Executive
Proforma 1	3	Not Applicable	Not Applicable	Not Applicable
Proforma 2	2	5	1	1

---

[8] Two frameworks were not included in the evaluation due to these frameworks not being agreed at this stage: Mutual Recognition of Professional Qualifications and Provision of Services. The other two frameworks where there are not proforma returns are the initial case study frameworks (Public Procurement and Plant Varieties and Seeds) – returns were not requested from these teams as this content was covered within the case study interviews.

Table A.2: List of proforma questions and whether they were contained in Proforma 1, 2 or both

Section 1: Background Information		Proforma number
Question 1.1	What is the name of this Framework?	Proforma 1 and 2
Question 1.2	Please provide information on the policy leads and their contact details:	Proforma 1 and 2
Question 1.3	Please provide details for the analysis lead (where this is applicable)	Proforma 1 and 2
Question 1.4	Proforma completion date	Proforma 1 and 2
Question 1.5a and 1.5b	Senior Responsible Officer (or equivalent) signoff obtained? Senior Responsible Officer (or equivalent) name and role	Proforma 1 and 2

Section 2: Implementation and Governance		Proforma number
Question 2.1a	What governance arrangements have been implemented for this framework?	Proforma 1
Question 2.1a	Were any of these arrangements in place prior to this framework being implemented?	Proforma 1
Question 2.2	What processes have been implemented for decision making for this framework?	Proforma 1
Question 2.3a and 2.3b	How regularly is this framework being reviewed? (drop down list) If other please specify	Proforma 1
Question 2.4a	Has your government given at least one month's notice on any changes to regulation? (drop down list)	Proforma 2
Question 2.4b	Has each of the other government's given you at least one month's notice on any changes to regulation? (drop down list)	Proforma 2
Question 2.4c	Please provide additional information on your answers at 2.4a and 2.4b if needed.	Proforma 2
Question 2.5a	Would you say that the level of communication between the four governments about this framework is too much, too little or about the right amount? (drop down list)	Proforma 2
Question 2.5b	Please expand on your answer at 2.5a with further detail on why you selected these responses, including providing information on the different methods that are used to communicate with the other Governments about this framework and whether you think this communication has been working well or less well.	Proforma 2
Question 2.5c	To what extent if at all do you think this framework being in place has led to greater information sharing between governments? (drop down list)	Proforma 2
Question 2.5d	To what extent, if at all, do you think this framework being in place has led to more joint working between governments? (drop down list)	Proforma 2
Question 2.5e	To what extent, if at all, does the joint working introduced by Common Frameworks reduce the likelihood of uncontrolled divergence occurring? (drop down list)	Proforma 2
Question 2.6	What meetings are in place to ensure effective operation of the framework since provisional signoff? Please list ALL relevant meetings and fill out each unique meeting individually and use drop down lists where provided. For each meeting list: - Meeting subject - Date - Recurring (or other) - Which governments attend - Other bodies represented - Chairing government - Meeting in place before Common Frameworks - Terms of Reference in place - Meeting minutes circulated - Any additional notes	Proforma 1

Section 3: Mechanisms		
Question 3.1	Please list any potential areas of dispute that have been identified in relation to this framework, including: - When do you think the dispute is likely to occur? (i.e currently/within a year/next few years) - Please provide more information on the potential dispute - What work is being carried out to track this?	Proforma 2
Question 3.2	Please list any disputes which have already occurred, including: - Was this dispute resolved? - Did the dispute escalate above official meeting level? - Was this dispute handled through non-official routes? - Was this dispute escalated through any IGR structures between UK Government and Devolved Governments Interministerial Groups, Interministerial Standing Committees?	Proforma 1
Question 3.3	Please describe the processes that are in place for handling divergence as part of this framework	Proforma 1
Question 3.4	When the framework was first implemented what area(s) of divergence was it intended to manage?	Proforma 1
Question 3.5	What additional evidence gathering of divergence is taking place in your area (for example within your department/government or externally)	Proforma 1
Question 3.6	Please list any potential areas for divergence covered by your framework, including: - When do you think the divergence is likely to occur? (i.e currently/within a year/next few years) - Please provide more information on the divergence - What work is being carried out to track this?	Proforma 2
Question 3.7	Please list any existing areas of divergence covered by your framework? For each of these: - Has this been agreed by all governments in the framework? If No please specify - Please describe the processes in place for handling this divergence - Has this divergence been published?	Proforma 1

Annex C: Rationale for Stage 1 case study selection

The criteria considered for the initial case study selection were:

1. UK Government department
2. Presence of UK Internal Market Act exclusions
3. Whether regulatory divergence has taken place within the framework area
4. Extent of devolved competence intersect (i.e., which governments the framework applies to)
5. Market or non-market framework[9]
6. In scope of the Northern Ireland Protocol (this was superseded by the Windsor Framework and for future case studies intersect with the Windsor Framework was considered within the selection criteria).

The initial case studies selected are presented below, these were prioritised based on ensuring that different characteristics of Common Frameworks were represented using known information about all frameworks. Interviews were carried out in February 2023 with Public Procurement officials and May to June 2023 with Plant Varieties and Seeds officials.

Table C.1: The characteristics of the Plant Varieties and Seeds and Public Procurement Frameworks

	Plant Varieties and Seeds	**Public Procurement**
Department	Defra	Cabinet Office
Presence of UK Internal Market Act exclusions	No	No
Presence of divergence	Yes	Yes
Market/ Non-Market framework	Market framework	Non-market framework
Interaction with Northern Ireland Protocol (superseded by the Windsor Framework)	Yes	No
Extent to which devolved competence intersect	Covers all four governments across the UK	Covers all four governments across the UK

---

[9]**Market/non-market framework**: A market framework is a Common Framework covering at least in part an area of regulation where the UK Internal Market Act market access principles can apply. In practice this can only apply to frameworks relating to the regulation of goods or services, such as DEFRA's *Resources and Waste* (which covers goods such as single use plastics). A non-market framework therefore is a Common Framework where these principles would not apply. Some frameworks are not market frameworks despite having a fundamentally commercial or economic subject matter, e.g., the NFR Framework *Consumer Protection* is about goods and services, but it is about the rights of consumers rather than specific goods or services, or Cabinet Office's Public Procurement which relates to the process's governments can use to procure, rather than what is being procured. (In the latter case the Market Access Principles therefore apply to regulation of goods and services **not** the procurement of those goods and services, which while this is regulated, it is not in itself a form of regulation of goods and services).

Annex D: Rationale for Stage 2 case study Common Framework selection

Selecting final case studies involved developing a range of criteria based on proforma data and other sources. In total, 15 main criteria were used to determine the 4 further case studies. Four Common Frameworks were excluded due to lack of data. These criteria were split into "objective" and "subjective" categories. "Objective" criteria were key information (such as department) which was easily corroborated by non-proforma sources, and "subjective" criteria were criteria based on our analysis of data gathered through the proforma.

The "Objective" criteria considered were:

- Department

- Market/non-market framework

- Presence of UK Internal Market exclusions

- Northern Ireland Executive-only framework

- Interaction with the Windsor Framework

The "Subjective" criteria considered were:

- Levels of activity on the framework

- Enough notice given of regulation changes

- Satisfaction with level of communications

- Active, business as usual or less active (based on meetings)

- Amount of significant divergence

- Retained EU Law related divergence

- Active, in between or inactive (based on levels of divergence)

- Amount of anticipated future disputes

- Retained EU Law related dispute

- Dispute likely, dispute possible, no dispute (based on levels of dispute)

The final case studies selected are presented below, these were prioritised based on varying levels of divergence. Fieldwork was conducted between December 2023 and February 2024.

Table D.1: The key characteristics of the Stage 2 case study frameworks

	Best Available Techniques	Agricultural Support	Food and Feed Safety and Hygiene	Commercial Transport and Operator Licensing
Department	Department for Environment, Food and Rural Affairs	Department for Environment, Food and Rural Affairs	Food Standards Agency/Food Standards Scotland	Department for Transport
Market framework	Yes	Yes	Yes	No
Interaction with the Windsor Framework	Yes	Yes	Yes	No
Level of activity overall	Some in future	High	High	Status quo
Enough notice given of regulation changes	Not applicable	Yes	Not Applicable	Yes
Indication of quality of comms	Room for improvement, governments agree	Good	Fine	Fine
Activity levels (meetings)	Business As Usual	Active	Business As Usual	Business As Usual
Retained EU Law related divergence	No	Yes	Yes	No
Activity level (divergence)	Active	Active	Active	In between
Potential disputes	None	Some	None	None
Likelihood of dispute	No dispute	Dispute possible	No dispute	No dispute

Annex E: Number of officials and stakeholders interviewed by government and external stakeholder in each case study

Most interviews with officials from the same government were carried out as one joint interview and at some interviews observers were present.

Table E.1: Number of officials interviewed in each case study

	UK Government	Scottish Government	Welsh Government	Northern Ireland Executive	External Stakeholder
Public Procurement	2	0	1	1	0
Plant Varieties and Seeds	4	1	3	2	1
Commercial Transport and Operator Licensing	1	Not Applicable (framework covers Northern Ireland)	Not Applicable (framework covers Northern Ireland)	1	1
Food and Feed Safety and Hygiene	1	2	1	2	0
Best Available Techniques	1	1	1	2	1
Agricultural Support	2	2	1	1	0