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**The proposed approach to domestic legislation relating to food and feed safety and hygiene, food compositional standards and food labelling (including nutrition labelling) in Northern Ireland.**

The UFU is the largest farming organisation in Northern Ireland, representing around 11,500 farming families. The structure of the UFU ensures that our policy positions are formed from the bottom up as each of the 25 regional groups have representatives on each commodity committee. Recommendations from these committees are then made to our Executive Committee where the UFU's final policy position is established. This consultation response therefore represents the views of representatives democratically elected to represent around 11,500 farming families throughout Northern Ireland.

**Do you have any comments on the proposed approach to technical amendments to NI domestic legislation relating to, food and feed safety and hygiene, food compositional standards and food labelling (including nutrition), to reflect the application of the Withdrawal Agreement and the NIP to ensure NI food and feed law remains effective at the end of the TP, as set out in this consultation?**

New legislation or amendments made to existing legislation must ensure that standards are maintained and that goods can move freely between NI and ROI (and NI and GB) under the NIP. Amendments stated as minor technical fixes that will not equate to a change in policy, must ensure minimal friction by negotiating advanced equivalence mechanisms that allow for the recognition of each other's standards and continued close alignment to keep trade flowing as freely as possible from administrative burdens.

Law must prevent the commercial discrimination of NI goods in the market place due to differentiation that arises as a result of the protocol. An example, such as differences in labelling or standards, could be exacerbated if NI comes to be regarded as a backdoor for EU and non-EU produce by the GB industry and customers.

**Do you identify any concerns or risks regarding the proposed approach that appear not to have been adequately addressed?**

The ease at which fundamental provisions can be amended at a later date if required to fix technical amendments. Consideration must also be given to the restrictions put in place when fixing technical amendments

Who will be responsible for accreditations that are currently carried out by EFSA. Will FSA have the ability to carry out accreditations with regard to animal feed labelling? Will EFSA accreditation still suffice?

**Are you aware of any impacts of the proposed measures that have not been identified in this consultation?**

Cannot comment as we are neither a business or enforcement body.

**Do you agree with the impacts that have been identified within this consultation?**

Cannot comment as we are neither a business or enforcement body, but supportive of continuation of EU rules in relation to food and feed safety and hygiene, food compositional standards and food labelling to allow for frictionless trade with the EU.

A handwritten signature in black ink, appearing to read 'Victor Chestnutt', written in a cursive style.

**Victor Chestnutt**  
**President – Ulster Farmers’ Union**