Northern Ireland Assembly

Committee for Health

OFFICIAL REPORT (Hansard)

Common Framework on Food and Feed Safety and Hygiene, and Common Framework on Nutrition Labelling, Composition and Standards: Food Standards Agency

4 February 2021

NORTHERN IRELAND ASSEMBLY

Committee for Health

Common Framework on Food and Feed Safety and Hygiene, and Common Framework on Nutrition Labelling, Composition and Standards: Food Standards Agency

4 February 2021

Members present for all or part of the proceedings:
Mr Colm Gildernew (Chairperson)
Mrs Pam Cameron (Deputy Chairperson)
Ms Paula Bradshaw
Mr Jonathan Buckley
Mr Gerry Carroll
Mr Alan Chambers
Ms Órlaithí Flynn
Ms Carál Ní Chuilín

Witnesses:

Ms Emily Miles	Food Standards Agency
Ms Maria Jennings	Food Standards Agency NI

The Chairperson (Mr Gildernew): I welcome, by video link, Ms Emily Miles, the chief executive of the Food Standards Agency (FSA), and Ms Maria Jennings, the NI director of the Food Standards Agency. When you are answering a question, I ask that you indicate who you are. I see that at least one of you is wearing a headset, which is useful. Will you also check that your email notifications are muted? We sometimes hear a lot of pinging because those who present to us are very busy people. Emily, are you leading off this morning.

Ms Emily Miles (Food Standards Agency): Yes, Chair. Can you hear me OK?

The Chairperson (Mr Gildernew): I can hear you. Fáilte romhat go dtí an Roinn Sláinte. You are very welcome to the Health Committee.

Ms Miles: Thank you very much, Chair, and thank you, members. I will make the opening statement, and we will be very pleased to take questions after that. I was in front of the Committee a couple of months ago on the nutrition labelling framework, so I have a sense of where you might go, but we will see.

I am grateful for the opportunity to give evidence to the Committee. Today, our focus is on the food and feed safety and hygiene common framework, the development of which has been led by my colleagues in the Food Standards Agency alongside officials from Food Standards Scotland.

The development of common frameworks is extremely important to the Food Standards Agency and shows our commitment to strengthening the close links and collaborative working arrangements that are already in place across Northern Ireland, England, Wales and Scotland. I emphasise that we are a body that works in Northern Ireland, England and Wales, and that is incredibly important to us as a founding principle.

The framework puts into place an agreement that commits the four nations to continue working together in the area of food and feed safety and hygiene at all levels and provides mechanisms for discussing and agreeing divergence where that is appropriate for maintaining high levels of consumer protection.

The constitutional teams of the UK and devolved Administrations have been engaged throughout the development of the framework and, importantly, have given their approval to its proposals. The framework consists of three interlinked documents. The first is the framework outline, which sets the detailed principles and processes that the four countries will follow when developing food and feed safety and hygiene policy. The second is the concordat, which sets out ministerial commitments under the framework. The third is a revised version of the existing memorandum of understanding between the two food safety bodies — the FSA and Food Standards Scotland — which sets out the operational detail of official engagement and collaboration.

We have carried out careful consultation on the framework proposals to deliver a framework that is as effective as possible. That includes engagement with key industry bodies, both written and virtual, and an event on 9 October 2020. In Northern Ireland, the industry associations and retailers were provided with a summary of the framework. Initial feedback and questions were encouraged on the framework proposals. In Northern Ireland, we received one written response to the written feedback request, and three Northern Ireland attendees registered for the online session.

In general, stakeholders have been very supportive of the framework proposals and have considered them to be an effective means of achieving a unified regulatory regime after the end of the transition period. We have strong relationships with the Northern Irish food industry and its associations, and we continue to engage with it on the consequences of EU exit, including on the importance of the structures and governance of four-nation collaboration and decision-making post transition. We have ensured that our regular industry engagement has included a focus on the framework, such as through the Northern Ireland food industry liaison group.

Further consideration of the framework has been provided by Ministers, both individually and collectively through the Joint Ministerial Committee provisional agreement, and by senior officials through the UK Government and devolved Administration frameworks project board, and the Food Standards Agency and Food Standards Scotland board discussions on the proposals. You will know that our board discussions happen in public.

Neither the framework proposals nor leaving the EU change the FSA’s top priority, which is to ensure that food remains safe and is what it says it is. The board has clearly committed to that. Our high standard of food safety and consumer protection will be maintained. The framework facilitates that across the UK by building on and formalising the collaborative ways of working that we already have in place. The areas of scope in the framework are areas of retained EU law, and those are detailed in the framework, as you will know, but the legislation covers all stages of food and feed production, including general food and feed hygiene rules; food and feed safety standards, such as products that require specific approval like additives and novel food; food and feed law enforcement, which includes things like official controls; labelling related to food safety, such as allergens; and public health controls on imported food and feed.

The legislation in the scope of the framework falls within annex 2 of the Northern Ireland protocol. Therefore, EU legislation for food and feed safety and hygiene will continue to be directly applicable in Northern Ireland. While the circumstances in Northern Ireland will be different as a result of the Northern Ireland protocol, Northern Ireland's full participation in risk assessment and risk management processes will ensure that any decisions taken in the UK for implementation consider the potential impacts of legislative changes across all four nations, consumers and businesses, including Northern Ireland.

Meaningful collaboration across the four nations underpins the Government's instructions within that framework, particularly with sharing of common resources of expertise in risk analysis, including surveillance, research, emerging issues and intelligence.

Now that the transition period has ended, one of the key responsibilities is managing risks in the food chain. Going forward, the FSA and Food Standards Scotland will continue to assess food and feed safety risks and provide independent advice to consumers, Health Ministers and others so that people can trust that the food that they buy is safe and is what it says it is.

That risk analysis work has always been undertaken by the Food Standards Agency and Food Standards Scotland together. Regular and routine communication already occurs between policy teams and scientists across the four nations. Those arrangements have been strengthened to allow joint development of risk management advice to Ministers, and I can say more about that in questioning if you would like me to.

We recognise that the framework will be constantly evolving and will be subject to ongoing monitoring and review, and a review process is embedded within the framework.

Thank you for your time this morning. We are happy to take any questions.

The Chairperson (Mr Gildernew): Thank you very much, Emily. That is very useful. Towards the end, you touched on risk analysis and how the provisional framework takes into account the protocol here. How does that interact, and how is that risk assessment done? How does it ensure that the important regulatory alignment for our food-processing and food production industry here is protected? I would appreciate some more information on that.

Ms Miles: You will know that Northern Ireland will continue to keep pace with EU rules and changes on food and feed safety, and, in Great Britain, we will consider our own rules. We will keep a close eye on EU developments. We have set up a horizon scanning function in the Food Standards Agency. We have trained our policy colleagues to make sure that they can carry out desk-based monitoring of EU legislation, which will include things like checking the comitology register, which is the register of EU committees and documents and committee meetings. We are also in regular contact with the UK Mission to the EU (UKMis Brussels), which will provide additional intelligence on proposals.

In addition to that, the Northern Ireland Civil Service and the Northern Ireland Executive have an office in Brussels, which will keep an eye on what the EU does, so we will be following what happens. I should add that we have very close working relationships with the Food Safety Authority of Ireland. That is another way in which we can keep track of what is going on. There are formal notification provisions in the trade and cooperation agreement whereby the EU and UK have to notify each other of changes in the law, so that is the means by which we will keep track. As far as possible, because this is driven by science and is about food safety and consumer interests in food, we expect that there is unlikely to be much divergence in arrangements. Therefore, for example, businesses will apply for the authorisation of new feed additives. We will do the scientific assessment of that. It will also be done by the European Food Safety Authority. It is highly unlikely that we would come to different views because the science is the science. We expect that, in the main, things will keep track with each other. There may be some differences in timescales. The rules are very strict about the timescales within which you must consider those applications. If an application arrives sooner in the EU than it arrives in GB, it might move slightly differently, but we would expect the end result to be the same.

I will pause there. There is much more to say about the issue, but you may have follow-up questions, Chair.

The Chairperson (Mr Gildernew): For now, that is OK for me. Members may want to explore the issue.

I want to explore another issue with you, Emily. You mentioned that there was stakeholder engagement on the framework in September and October. What was the outcome of that? How did you engage with stakeholders here in the North? What was the extent of that?

Ms Miles: I will ask Maria, our Northern Ireland director, to say a little more about that, but, in principle, we do engage. We had a big stakeholder-engagement event online, and lots of people attended that. We have also written to people and have had written feedback. I would say that, in Northern Ireland, we have found that our stakeholder engagement with businesses, consumer groups and local authorities has been heavily focused on the implementation of the end of the transition period. Therefore, we have not yet had as much response on the frameworks question. I think that that is probably right with regard to a prioritisation approach. The frameworks set out a means by which we follow each other's processes and laws, and it is where there is a dispute resolution process for

Ministers to raise a flag if they are concerned. It will operate over a long period and will have an annual review process so that we can keep adjusting it. I can understand why stakeholders would be particularly focused on the immediate questions of the end of the transition period. Maria, perhaps you could supplement what I have said.

Ms Maria Jennings (Food Standards Agency NI): Thank you very much, Emily. Good morning, everyone. I will explain a little of the background on how we engage with the food industry. Can everybody hear me OK?

The Chairperson (Mr Gildernew): Yes. We hear you fine, Maria. Thank you.

Ms Jennings: Lovely, Colm. Thank you. We established a food industry liaison group way back in 2008. It was on the back of one of our big incidents. The group has representation from right across the food and feed industries. That group has proved valuable to us over the years. We talk to it very regularly. In the past few months, we have been working jointly with DAERA to talk to the group, particularly about its COVID-19 pressures and also the EU exit transition issues that it raises with us more generally. On 21 January, we took the group through our framework proposals in some detail. It was generally content with what we said. The group's greatest concern is that it will still have access to the GB market, because that is its biggest market. We were able to reassure the group that that would be the case: all food that is produced in alignment with the European Union will have unfettered market access to GB. The industry is quite content with that. We will continue to talk to the group. We meet it regularly, so we will continue to have those conversations through that route.

The Chairperson (Mr Gildernew): Can you provide the Committee with the membership of that group to give us some idea of the extent and the areas that are covered?

Ms Jennings: Colm, we sent that through in our response to the nutrition framework conversations, so it is in a letter that the Committee has already received.

The Chairperson (Mr Gildernew): OK. Thank you. I will move on to members.

Mr Buckley: Thank you, Emily and Maria, for your presentation. Having read the common framework, I believe that it still highlights the absolute follies in the Northern Ireland protocol. I have a lot of concern about that and believe that direct action will need to be taken. The framework suggests that, in some instances, Northern Ireland will be unable to implement the same food and feed safety policy approaches as GB countries. It would be useful to know what those areas are right now and which areas are likely to come under the threat of divergence in the very near future.

There is also a clear risk that new products entering Northern Ireland will be carried by the EU with no allowance for assessing UK-wide implications for protecting human health. I ask the representatives: what mechanisms, if any, are included under the framework to allow devolved regions to input to trade negotiations in the areas covered — food standards — to minimise divergence? Is there a fear that the provisions of the Internal Market Bill will allow mutual recognition so that regions could override the aims of the framework in the future?

Ms Miles: There is a lot in those questions. Let us start at the end, which was the question about trade. You will know that trade is a reserved matter. DEFRA and the Department for International Trade (DIT) work closely with the devolved Administrations to deliver a trade policy that is intended to work for the whole of the United Kingdom. While trade is reserved, devolved Administrations are responsible for implementing and observing obligations arising from those trade agreements. There is a ministerial forum for international trade, which ensures a regular and formal structure to support discussion and engagement on potential trade agreements.

I should say, more specifically, from the Food Standards Agency point of view, that we are the key adviser to DEFRA and the Department for International Trade on food safety issues, and we are represented directly at Codex Alimentarius, which is the international body where international standards and guidelines on food safety are set. That is a reference body, and the World Trade Organization refers to it a lot. We are committed to sharing information as openly as possible with the three nations in the Food Standards Agency, and also with Food Standards Scotland, as those positions are developed. That is set out in the memorandum of understanding between the Food Standards Agency and Food Standards Scotland.

The intention is to make sure that, when international obligations are entered into, they account for the realities on the ground in the four nations of the UK. I should emphasise that — Maria may want to supplement this — because we have a Northern Ireland office of the Food Standards Agency and a Northern Ireland director, we have directly funded staff from the Northern Ireland Executive and a budget, and we have our stakeholder engagement provisions in Northern Ireland, which means that the Northern Ireland perspective is well represented in our discussions with DIT, DEFRA, Codex and other bodies.

There is a question over whether there will be a sufficient UK-wide basis to protect human health. That is particularly important, but I emphasise to the Committee that, while it is true that Northern Ireland will follow EU rules, the Food Standards Agency has committed to taking account of Northern Irish consumers and their experiences of food in our risk analysis process. We consider the products that are being applied for for authorisation. We will look at the specific consumption habits in Northern Ireland, as we would in Wales and England. That will inform our recommendations to Ministers about whether those products should be authorised, and it will also inform any representations that we may want to make to the EU.

Take orange squash: children in the UK tend to drink more orange squash than is the case in the EU, where it is more of a sports drink and children do not consume it as much. That is a specific consumption habit in relation to certain additives in a certain product. We want to make sure that that experience and understanding are being fed to the EU for its consideration about an additive that might end up in orange squash, so that the experiences of Northern Irish consumers could be reflected in both places.

You asked about the areas that are under threat of divergence. The intention of the frameworks is that there will not be divergence as they are meant to be common frameworks. However, as you noted, the Northern Ireland protocol creates a situation in which, because Northern Ireland tracks EU rules, there is very likely to be change. As I mentioned, I can identify the regulated products process whereby applicants can apply for authorisation for novel foods or additives. I do not think that there will an intention for divergence there as it is very likely that we will track each other, but it is possible that timescales could mean that something is first authorised in the UK or EU. Over the next 10 years, I suspect that there will be applications for authorisation of insect-based products such as mealworm and so on. A business might apply to the EU market but not apply to the UK, or vice versa. It might be about the safety of products of animal origin and, particularly, the hygiene requirements that we put into place for official controls in meat abattoirs. The EU regime that we have inherited in the UK is quite prescriptive about the outcomes and the ways in which you achieve those outcomes. We are very interested in looking at whether official controls can be done with the same outcome but with a bit more flexibility about who might undertake the checks or where they might be. Does an official vet need to be on the premises, or can the check be done under the supervision of an official vet at a distance? We need to look at those things. The EU has been developing reforms to their official controls *[Inaudible]* that those two things run not in parallel.

In the last area, there could be totemic questions when GB and the EU could be in different places because they have different interpretations of the science. The issue of gene editing emerged earlier this year is, and the English Government have put out a consultation. I emphasise that, before any kind of gene-edited product is put on the market, the Food Standards Agency needs to assess its safety. That assessment has not yet happened, so we cannot comment on the safety, or lack of safety, of gene editing. However, you can see that we could end up with divergence on those sorts of issues if there were different approaches to the science.

Mr Buckley: Emily, can you comprehend how offensive it is to somebody of my persuasion — a unionist in Northern Ireland — to see this potential divergence, and even, in the initial stages, the impact that the Northern Ireland protocol has had? I am thinking, for example, of soil and seed potatoes. I could go on because the list is endless. You named a number of products that could have a divergence in the future. However, can you understand how difficult that will be in Northern Ireland, given the situation with the Northern Ireland protocol?

Ms Miles: Indeed. I believe that it is not for me or the FSA to comment on the Northern Ireland protocol or the arrangements that are in law. We have to apply what has been established through the treaties and in law, so I am doing my best to communicate the implications. However, I appreciate that it is difficult.

Ms Ní Chuilín: Can you hear me, Chair?

The Chairperson (Mr Gildernew): I can hear you, yes. Go ahead.

Ms Ní Chuilín: My connection is very unstable. First, thank you, Emily and Maria, for the written material, which, as a new Committee member, I have found very helpful, and for your responses thus far. Will you clarify for me that most of the issues are reserved matters and that there is still a recognition of and, indeed, an adherence to or honouring of the EU directives? What are the implications, if any? Given the commentary from some unionists not just on east-west relations but on North/South relations and the all-Ireland bodies, will this have an implication for that arrangement? What were the arrangements for soil and biosecurity up to now? What difference is there, if any?

Finally, this is just a comment. I find it quite disturbing to hear Jonathan using language like "direct action". I do not know what that means. However, I ask people not to get involved in hyperbole. The situation needs to be calmed, and that sort of commentary is not helpful. Maybe he would like to clarify his comment. I appreciate that that was not a question for Emily and Maria.

The Chairperson (Mr Gildernew): Go ahead, Emily, please.

Ms Miles: Carál, sorry, I did not catch your first question about the EU directives. Do you mind repeating that?

Ms Ní Chuilín: You said that many of the issues are reserved matters between DEFRA and others. Given the responsibility to meet the EU directives, what bearing, if any, does that have on the directives? What impact, if any, will that have? We have heard a lot about east-west relationships and, indeed, some threats about North/South relationships. What impact, if any, will it have on the all-Ireland body for food safety?

Ms Miles: Sorry for not catching that first time.

Trade is reserved, but food and feed matters are devolved. For example, Wales can make its own choices about food labelling and whether to authorise a product. Until December 2020, the EU framework ensured alignment, and we established these frameworks to ensure that there is a process to get as single an approach as possible across the four nations on devolved issues. In effect, Northern Ireland will change its rules in line with the EU, and we will be keeping up with that and making judgements about whether we should recommend those changes to the English, Welsh and Scottish Ministers at the same time. I hope that that answers your question.

On the all-island arrangements, we have set out our very strong collaborative relationship with the Food Safety Authority of Ireland (FSAI) in a memorandum of understanding (MOU). We are reviewing that MOU across both organisations because we are conscious that it needs to reflect the new arrangements. We meet regularly with the FSAI in Ireland, as set out in our current MOU, to discuss issues like incident management, nutrition labelling and dietary health. In May 2020, we discussed with senior management officials from both organisations the importance of developing the common frameworks for agreed policymaking across the UK.

I should also mention Safefood, a cross-border body created under the terms of the Good Friday Agreement and tasked with promoting food safety and healthy eating on an all-island basis. The FSAI works with Safefood and other relevant Departments to ensure cross-border collaboration and consistency in both approach and consumer messaging where possible. Maria may want to say a bit more about that. I will ask Maria to pick up the soil and biosecurity question and outline what difference there is, if any.

Ms Jennings: Thanks, Emily. I reassure the Committee that we have built really strong and resilient working relationships with the Food Safety Authority of Ireland over the 20 years that the two bodies have been working together. For example, we have carried out joint exercises, shared intelligence, delivered conferences together and gathered scientific evidence across the island. We have regular official working groups that look at specific issues, and, in general, we touch base regularly on the work that is being done.

In anticipation of the new working arrangements between the UK and the EU, we have, as Emily said, been reviewing the MOU. Protocols for, for example, data sharing, how we communicate and incident handling are all being refreshed and renewed so that the new arrangements will be taken into account. Similarly, we work very closely with Safefood, which, as you know, has a particular remit in Northern Ireland. We make sure that we have representation on Safefood's working groups. When Safefood is

thinking about doing science gathering or evidence gathering, we work very closely with it to make sure that it gets it right for Northern Ireland consumers. We can then feed that evidence into the FSA. We have that additional evidence when we have these conversations about risk assessment and risk management.

Finally, biosecurity has always been a big issue. DAERA has the lead on biosecurity in Northern Ireland. However, in fairness, we work very closely with DAERA to make sure that there are no food safety risks. If we identify such risks, we will deal with them on an all-island basis.

Ms Miles: I will come in with one other point. Chair, you asked earlier who was on the Food Industry Liaison Group for Northern Ireland. I have just been able to fish out the details. We have the Northern Ireland Meat Exporters Association, the Livestock and Meat Commission, the Northern Ireland Pork and Bacon Forum, the Ulster Farmers' Union, the Northern Ireland Food and Drink Association (NIFDA), the Northern Ireland Poultry Federation, Dairy UK, Invest Northern Ireland and the Northern Ireland Grain Trade Association.

The Chairperson (Mr Gildernew): Thank you. That is helpful, Emily.

Ms Ní Chuilín: Thank you for that. We need some clarification on a lot of issues, but I appreciate that you will get a lot of questions and suggestions, so we will come back to those at the end. Thanks very much.

Ms Bradshaw: Thank you, ladies, for coming before the Committee again. You may have just answered my question, which is on engagement with the smaller producers and manufacturers. I am not sure whether I am putting words in your mouth but I think that, the last time that you were here, you said that you did not have personnel operating in Northern Ireland. Is that happening? How much are you actually engaging with the small producers? They are dealing with COVID and the pressures on their workforce through staff self-isolating etc. How we are supporting the very small producers at the far end of the food chain, who are feeling a lot of pressure?

Ms Miles: We have people in Northern Ireland. I will let Maria describe her rather large office of people.

Ms Jennings: Thank you very much. Paula, I am not sure how that was picked up last time. Apologies for that. We have quite a big team in Belfast, which is actually growing because of the capacity and capability that we require to do the work that we need to do post EU exit. We rely on the trade bodies to a certain extent. As you know, it is very difficult to reach some of those SMEs. We rely a lot on NIFDA, which puts out a lot of our communication directly to its membership. We also rely on Invest NI. It puts an awful lot of information for businesses on its business info site. As well as that, we have been working with businesses on a number of issues. We work through the Loughry campus and touch base with the knowledge providers who work with and advise the food industry. We regularly go to industry meetings set up by the people at Loughry. We use the mechanisms in place in Northern Ireland as much as we can to get to SMEs directly. We have also been involved with the recent DAERA webcasts about the new arrangements. We have been, as much as possible, open and accessible in getting information out through our own website, Twitter account and so on. We try, through all the various channels, to reach the industry as well as we can.

Ms Bradshaw: Thank you. I think that, last time, it was to do with the engagement event, and I may have picked that up incorrectly.

It is one thing to send information out through a network, but are you doing any evaluation by going straight to SMEs and asking them what is the best way for you to communicate with them directly, given the pressures that they are feeling at this time? Sometimes, we think that, as soon as we have sent an email, the job is done, but, much of the time, those emails go unread.

Ms Jennings: I totally agree with you: it is really difficult to get information out to businesses, especially with the pressures that they now face on many different fronts. They are bombarded from right across government about different things that government wants them to deal with. One thing that we picked up from stakeholders in the past couple of months was, "Do not bother us. Please, do not send us anything that is not directly related to EU exit or COVID-19", and that is simply because they are under so much pressure. We continue to tap into the networks that we have to ensure that we get as much coverage as we possibly can under the circumstances that we face at the minute.

Ms Bradshaw: OK. Thank you very much.

The Chairperson (Mr Gildernew): OK. Thank you for that. The Committee may want to have a quick discussion on this framework. I am conscious that we also have the other framework, on nutrition-related labelling, composition and standards, on which we have already received a briefing. Do members have any additional questions on that framework? Then, we can consider the two frameworks.

Do you consider that the framework on food and feed safety and hygiene takes account of the protocol? Do you envisage any issues emerging, or are issues emerging already at this stage?

Ms Miles: The food and feed safety and hygiene framework accounts for the protocol as written. I think that the nutrition labelling, composition and standards framework that you considered in the autumn was written many months before and did not sufficiently account for the Northern Ireland protocol. It will be updated to reflect the obligations in the Northern Ireland protocol. For instance, it needs to make it clear that there is more chance of divergence than was expected. We will, basically, import the language that we have used in the food and feed safety and hygiene framework into the nutrition labelling, composition and standards framework. We also need to reiterate in the nutrition framework the commitment to a four-nation approach to policy consideration, governance and dispute resolution. We need to stress, in particular, Northern Ireland's continued participation in risk management considerations. We want to ensure that the nutrition framework properly aligns with what we are doing on food and feed safety.

The Chairperson (Mr Gildernew): OK. Thank you. I have an indication from Alan. Do you have a question on either of the frameworks, Alan?

Mr Chambers: Yes. Earlier, Emily mentioned in her presentation that, if producers were looking for authorisation for new products or a change of ingredients etc, the two agencies, the European agency and our agency, would look at it. She said that it was unlikely that they would have ever have a difference of opinion, but never say never. If, in fact, there were any differences of opinion on issuing an authorisation in those circumstances, where would the primacy of decision-making lie? Would it lie with the European side or our side? Knowing that the EU has a reputation of not doing things very quickly at times, do you anticipate any delays because of this twin-track approach?

Ms Miles: The EU arrangements have primacy in Northern Ireland, and, as I said earlier, there is a possibility of a difference in timescales. If there is dissatisfaction, and if Northern Irish Ministers, for instance, are unhappy with a decision that the EU has taken and how it applies in Northern Ireland, you would have to use the arrangements through the Joint Committee to raise those between Northern Ireland and the EU. Obviously, that is the nuclear situation, and we hope that that will not happen. The arrangements that we are setting out in a framework are intended to try to prevent that from happening. The risk analysis that we are doing, the consideration and so on will inform the advice that we put to Northern Irish Ministers so that they are aware of what is going on and can use the arrangements appropriately for consultation and so on with the EU.

Mr Chambers: Thank you.

The Chairperson (Mr Gildernew): OK, thank you, members. Everyone who sought to come in with a question has done so.

Once again, I thank Emily and Maria for attending our meeting and for answering members' questions. We are likely to see you again as this all works its way through. Thank you very much for coming to the Committee this morning, and I wish you all the best of luck.

Ms Miles: Thank you very much. We really appreciate the opportunity.

Ms Jennings: Thank you.