

The Veterinary Medicines Directorate  
A Hampton Implementation Review Report

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February 2010

# Veterinary Medicines Directorate

This review is one of a series of reviews of regulatory bodies undertaken at the invitation of HM Treasury to assess regulatory performance against the Hampton principles and the Macrory characteristics of effective inspection and enforcement. The review process is designed to identify where a regulator is on the road to full implementation and the issues each needs to address to become Hampton-compliant.

The review was carried out by a team drawn from the Better Regulation Executive, the Security Industry Authority and the Human Fertilisation and Embryology Authority. The review team is grateful to VMD for its support and commitment over the review period. Its leadership team and staff were extremely helpful and generous with their time. We are also grateful to VMD's stakeholders for their helpful insights.

Further information about the reviews can be found at:

<http://www.berr.gov.uk/whatwedo/bre/inspection-enforcement/page44029.html>

## EXECUTIVE SUMMARY AND CONCLUSIONS

Key findings from the review:	<p>The Veterinary Medicines Directorate (VMD) demonstrates broad and consistent compliance with the Hampton principles. The review team's key findings are:</p> <ul style="list-style-type: none"><li>• The VMD places a strong emphasis on providing advice and guidance, with stakeholders noting that they are largely clear and of good quality. This is demonstrated by the annual publication of the Veterinary Medicines Regulations and guidance which are widely appreciated by stakeholders;</li><li>• The VMD is increasingly aware of the administrative burden placed on businesses when requesting and collecting information for its own use. To help manage this burden, it introduced electronic submission of data for those seeking Marketing Authorisations in January 2010;</li><li>• The VMD has Memorandums of Understanding with regulators such as the Medicines and Healthcare products Regulatory Agency (MHRA) and the Royal College of Veterinary Surgeons (RCVS) with reference to delegated and joint inspections, which can help reduce absolute numbers of unnecessary inspections; and</li><li>• The VMD clearly states the outcome it is seeking to achieve through its activities, which is "the responsible, safe and effective use of veterinary medicinal products". This is clearly stated on its publications and website.</li></ul>
Issues for follow-up identified during the review:	<ul style="list-style-type: none"><li>• The VMD should publish its innovation policy, showing, in particular, how it is using new methods, tools and technologies to help businesses navigate the veterinary medicines regulatory landscape when bringing new and innovative products to market.</li></ul> <p><i>We understand that the VMD will publish its strategic communications strategy and relevant guidance by 1 April 2010.</i></p> <ul style="list-style-type: none"><li>• The VMD should publish the escalation policy that is followed when it identifies concerns with an organisation or premises. This would help increase transparency.</li></ul> <p><i>We understand that the VMD will publish its enforcement strategy by 1 April 2010.</i></p> <ul style="list-style-type: none"><li>• The VMD should publish the risk analysis and triggers that it utilises to determine the frequency of its inspections and re-inspections. Businesses would also welcome greater transparency around the list of organisations due for</li></ul>

inspection, say over the next year. This would also allow stakeholders of the inspected organisations to participate if they wished to.

*We understand that the VMD will publish the way it determines the frequency of inspections and re-inspections.*

- The VMD should work more closely with policy officials domestically and at the European Union level to reduce the administrative burden on businesses stemming from veterinary regulations, including, for example, the marketing authorisation process.
- The VMD should develop a strategic and consistent approach to its provision of advice and guidance so that it is better able to identify, monitor and prioritise any gaps that emerge.

*We understand that the VMD will reflect this in its communications strategy and establish a project to develop and roll out a more strategic approach to the provision of guidance.*

- The VMD should work closely with Defra and its counterparts across the European Union to influence veterinary medicines policy.

*We understand that the VMD plays a leading role in the European Heads of Medicines Agencies group, providing key veterinary medicines input and that it will look to identify opportunities to further influence EU veterinary medicines policy.*

## INTRODUCTION

<p>Introductory background information about the regulator:</p>	<p>The Veterinary Medicines Directorate (VMD) was established in February 1989 to:</p> <ul style="list-style-type: none"><li>• authorise and control the manufacture and use of veterinary medicines;</li><li>• carry out the post-authorisation surveillance of suspected adverse reactions and for residues of veterinary products in meat and other animal products; and</li><li>• provide policy advice on these matters to the Agriculture Ministers and implement their decisions.</li></ul> <p>The VMD was established following the publication, in February 1988 of the <i>Review of Animal Medicines Licensing</i> by Mr P.W. Cunliffe CBE, former Chairman of ICI Pharmaceuticals Division. The main recommendations of this Report brought together a variety of assessment and licensing activities for veterinary medicines vested at the time in the then Ministry of Agriculture, Fisheries and Food (MAFF).</p> <p>The integration of these regulatory activities into a single Directorate allowed the full cost of the licensing work to be met from fees paid by the industry to a single organisation. Since its establishment the VMD has succeeded on a year-on-year basis to meet its full cost recovery targets.</p>
<p>The legislation establishing the regulator:</p>	<p>The VMD is an Executive Agency of Defra. As such, it is staffed with civil servants and it has no separate legal existence to the Department, but it has substantial operational independence from it.</p>
<p>The regulator's statutory remit or objectives:</p>	<p>VMD's vision is ensuring "the responsible, safe and effective use of veterinary medical products." Its responsibilities include:</p> <ul style="list-style-type: none"><li>• <b>Authorising</b> veterinary medicines and <b>monitoring</b> their safety and efficacy following the grant of a Marketing Authorisation. Marketing Authorisations are issued to companies once they have demonstrated that their product is of the appropriate quality, can be used safely and will be effective when used in accordance with the instructions that accompany them. There are presently over 1,700 Marketing Authorisations in the UK for</li></ul>

	<p>veterinary medicines. The VMD website includes a list of these products and a Summary of Product Characteristics for each of them (<a href="http://www.vmd.gov.uk/espsite/default.aspx">www.vmd.gov.uk/espsite/default.aspx</a>). The website also provides a summary of the data assessment carried out for recent national applications.</p> <ul style="list-style-type: none"> <li>• <b>Developing, updating and enforcing</b> legislation relevant to veterinary medicines, controlling them from their point of manufacture, as they are supplied and all the way through to their moment of administration. The Veterinary Medicines Regulations, revoked and remade annually, are intended to bring together all of the legislation relating to veterinary medicines in the UK and to implement European legislation.</li> <li>• <b>Monitoring</b> foodstuffs derived from animals for residues arising from the use of veterinary medicines and unauthorised animal medicines. Two schemes are operated by the VMD: the statutory residues programme which is paid for by the relevant UK food producers and the non-statutory programme for imported food which is paid for by the Government.</li> </ul>
<p>The regulator's budget:</p>	<p>The VMD's income for 2008/09 was approximately £15 million. Around three quarters of the income comes from charges and levies paid for by the relevant sectors of industry which include the pharmaceutical industry, primary food processors and veterinary surgeons. This funding operates on a full cost recovery basis. Defra provides funding in the region of £3 million each year, which largely goes towards meeting enforcement costs and non-statutory residue testing.</p>
<p>Number of staff:</p>	<p>As at 31 March 2009, the VMD employed 149 permanent staff, both full and part time (VMD Annual Report and Accounts 2008/09).</p> <p>As an Executive Agency, VMD does not have a statutory board, but does have an advisory board that is chaired by Defra's Chief Veterinary Officer. The VMD's Management Board is chaired by the Chief Executive and includes three external members, who also constitute the Audit and Risk Committee.</p> <p>The VMD's headquarters are in Addlestone, Surrey.</p>
<p>The sectors and number of businesses regulated either</p>	<p>The VMD has a wide range of stakeholders. Those who are directly subject to its work as a regulator include some identified 4,500 customers who pay for the services</p>

directly or indirectly:	provided. In descending order of income in 2006/07, these were: <ul style="list-style-type: none"><li>• 352 pharmaceutical companies</li><li>• 286 red meat abattoirs</li><li>• 73 poultry abattoirs</li><li>• 30 fish farms</li><li>• 255 milk processors</li><li>• 883 medicated feed manufacturers</li><li>• 1,326 veterinary surgeons</li><li>• 1,221 “suitably qualified person” premises</li><li>• 1 egg trade association representing hundreds of customers</li><li>• 32 medicine export companies</li><li>• 284 medicated feed suppliers</li><li>• 23 game abattoirs.</li></ul>
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<b>THE HAMPTON VISION</b>	
	<i>“Both the Hampton and Macrory reports are concerned with effective regulation – achieving regulatory outcomes in a way that minimises the burdens imposed on business. Key to this is the notion that regulators should be risk-based and proportionate in their decision-making, transparent, accountable for their actions and should recognise their role in encouraging economic progress.”</i>
Any findings relevant to whether the review team believes the regulator is risk-based:	<p>A substantial part of the activities carried out by the VMD is set out in European and domestic legislation. For example, EU guidance linked to Directive 2001/82/EC requires that manufacturers are inspected with a recommended frequency of 2 years to ensure issues can be resolved before the expiry of the 3 year Good Manufacturing Practice (GMP) Certificate and the Veterinary Medicines Regulations (VMRs) used to specify a 2 year inspection programme cycle for all of the VMD’s inspection activities.</p> <p>However, the VMD’s use of a ‘risk rating’ after an inspection can help ensure a risk-based approach to inspection with businesses or premises that are higher risk being inspected more frequently.</p> <p>This report also recommends that the VMD put its non-statutory residue surveillance programme on a more risk-based footing, especially where retailers carry out their own testing. We understand that risk-based sampling is already carried out on the non-statutory programme, but there is scope to prevent unnecessary duplication where testing is done by retailers.</p>
Any findings relevant to whether the regulator is transparent and accountable:	<p>The VMD is transparent. It has a good and close relationship with the industry and publishes a large amount of information through various forms of media. However, the VMD could further improve its transparency by publishing:</p> <ul style="list-style-type: none"> <li>• the escalation policy that is used when it has identified concerns with an organisation following an inspection;</li> <li>• the risk analysis and triggers that it uses to determine the frequency of its inspections and re-inspections; and</li> <li>• the list of organisations due for inspection, alongside an annual prospective schedule.</li> </ul>
Any findings relevant to whether the regulator encourages economic	<p>The VMD regulates the supply of veterinary medicinal products in the United Kingdom. However it is keen to minimise the burden of this regulation on the industry, for example, through its Small Animal Exemption Scheme (SAES) that allows ‘low-risk’ products for ‘low-risk’ species to be exempted from the normal marketing authorisation process. However:</p>

progress:	<ul style="list-style-type: none"><li data-bbox="399 185 1428 414">• The process that manufacturers have to negotiate when seeking a change to existing marketing authorisations can impose a considerable burden. Stakeholders contend that this impacts their ability to bring modified products, for example, with more indications, to market since additional, and arguably unnecessary, regulatory requirements can make this cost-prohibitive;</li><li data-bbox="399 448 1428 707">• The VMD should publish its innovation policy outlining how it is using new forms of technology to help veterinary medicine manufacturers bring new products to market. In addition, the VMD should set out the opportunities that the industry has within the regulatory framework to market products and help improve the availability of medicines in the veterinary sector.</li></ul>
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## DESIGN OF REGULATIONS

### ***Hampton Principles***

*“All regulations should be written so that they are easily understood, easily implemented, and easily enforced, and all parties should be consulted when they are being drafted.”*

*“When new policies are being developed, explicit consideration should be given to how they can be enforced using existing systems and data to minimise the administrative burden imposed.”*

Key findings on Design of Regulations:	The VMD should work closely with Defra and counterparts across the European Union to influence veterinary medicines legislation along better regulation principles.
Background information such as the regulator’s role in developing regulations:	VMD is responsible for the Veterinary Medicines Regulations which are updated into a consolidated document on an annual basis. Although much of the relevant legislation originates from the European Union, VMD actively contributes ideas for change through the relevant EU structures e.g. to reduce administrative burdens from new veterinary medicines regulation.
Examples of good practice:	<p>VMD has consolidated all relevant legislation into a single coherent set of regulations that are updated on an annual basis. Each annual update is subject to an impact assessment with a full 12 week consultation.</p> <p>The resulting Veterinary Medicines Regulations have been acknowledged by stakeholders as a major step forward.</p>
<p>Review findings:</p> <p>The extent to which the review team believes the regulator is acting in line with the Hampton principles:</p>	<p>Although a significant part of veterinary medicines regulations originate in the EU, the VMD actively seeks to implement legislation in a way that is compliant with Hampton principles and influence the development of future legislation by ensuring that the administrative burdens on businesses are also considered. For example, the VMD recently hosted a stakeholder meeting to discuss retailers’ and animal keepers’ record-keeping obligations.</p> <p>While the VMD participates in the relevant European negotiations, to date, there are few examples of successful outcomes and sustained effort will doubtless be required to deliver these. Businesses have indicated that they would appreciate tangible and noticeable outcomes.</p> <p>More could perhaps be done to learn from other EU member states’ agencies and to work with them to influence EU legislation.</p> <p>Whilst acknowledging the success of the consolidated Veterinary</p>

	Medicines Regulations, the recent annual updates have seen relatively few significant changes and VMD should consider whether this frequency of update is still appropriate.
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<b>ADVICE AND GUIDANCE</b>	
<b><i>Hampton principle</i></b>	
<i>“Regulators should provide authoritative, accessible advice easily and cheaply”</i>	
Key findings on Advice and Guidance:	<p>The VMD places a strong emphasis on providing suitable advice and guidance. Given the broad scope of the relevant legislation, stakeholders rely greatly on such advice and value its clarity and timeliness.</p> <p>A more strategic approach to advice and guidance could improve consistency and would help to identify any current gaps in communication.</p> <p>The complexity of regulations is such that some businesses find it necessary to use consultants to provide the level of advice needed.</p>
Background information such as the means by which the regulator provides advice and guidance:	<p>Guidance is readily available via the VMD website and via printed material including newsletters.</p> <p>Advice is also given in face-to-face meetings with stakeholders (during inspections, for example), through briefings, in journals and via telephone and email.</p> <p>Some printed material is distributed by partner organisations such as the Animal Medicines Training Regulatory Authority (AMTRA).</p>
Examples of good practice:	<p>The cycle of annual updates to regulations includes timely updates to the relevant guidance. One stakeholder commented that ‘we always know what is coming along because VMD has spent the last year telling us’.</p> <p>VMD engages well with its stakeholders and obtains appropriate input when drafting new guidance.</p>
Review findings:  The extent to which the review team believes the regulator is acting in line with the Hampton principle:	<p>VMD is in a strong position to comply fully with Hampton principles on advice and guidance. However, the breadth of the guidance required and the different audiences to be reached mean that there will always be opportunities to improve.</p> <p>The review team found no overall plan for provision of advice and guidance and a more strategic approach could help identify and prioritise any gaps.</p> <p>Except when given face-to-face, advice is not always tailored to the particular needs of each audience and little, if any, advice is geared towards the general public.</p>

	<p>There is potential for confusion between what the regulations require and what is considered good practice, above and beyond the requirements themselves. A consistent style of 'must' and 'it is considered good practice', already adopted in some material may help.</p> <p>The monitoring of understanding of guidance appears ad hoc and could be checked, for example, during inspections and customer care visits or within surveys.</p> <p>One key stakeholder did not believe that VMD guidance was always authoritative. Although the review team is not in a position to comment on the specifics of this particular observation, the VMD should endeavour to resolve such cases to ensure that future advice is not undermined.</p>
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## DATA REQUESTS

### *Hampton principle*

*“Businesses should not have to give unnecessary information or give the same piece of information twice.”*

Key findings on Data Requests:	The VMD is conscious of the administrative burden placed on businesses when requesting and collecting information for its activities. The VMD has now introduced electronic solutions for data submission of information requested as part of the marketing authorisation process as well as reporting serious adverse reactions by pharmaceutical manufacturers.
Background information such as the data required by the regulator; the means by which business can return data, etc:	<p>The VMD requests a broad range of information on veterinary medicines for the purpose of granting marketing authorisations and detecting suspected adverse reactions.</p> <p>Requested information relating to safety and efficacy (including field trials) for the purpose of securing a Marketing Authorisation or licensing variation can be comprehensive and lengthy for pharmaceutical companies; with data often running into several volumes of material. This frequently translates into considerable pre-submission data generation costs for companies and processing costs for the VMD. The requirement for comprehensive data has an EU legislative origin.</p> <p>For the purposes of detecting suspected adverse reactions from veterinary products, information collected enables the VMD to track the side effects of veterinary medicines on animals or humans. While pharmaceutical companies are obliged to report adverse reactions, veterinary surgeons, pharmacists and members of the general public are encouraged to do so as well; though they are under no obligation to do this. Reporting adverse reactions by individuals takes the form of completing a one-page sheet available on VMD’s website, which will be available to be completed and submitted electronically in the future.</p>
Examples of good practice:	<p>The small animal exemption scheme allows manufacturers of low-risk products to avoid the need to secure a marketing authorisation and the comprehensive information and data requests that accompany it.</p> <p>The VMD has now introduced the option that allows electronic submission without the requirement to provide a paper copy as part of the marketing authorisation process.</p> <p>Provision that allows the electronic submission and the online reporting of suspected adverse reactions are examples of good</p>

	regulatory practice.
<p>Review findings:</p> <p>The extent to which the review team believes the regulator is acting in line with the Hampton principle:</p>	<p>The VMD has shown compliance with this principle. However, there is scope for the administrative burden from the marketing authorisation process to be reduced much further. The VMD should work with the EU to secure the needed legislative changes.</p>

## INSPECTIONS

### *Hampton principle*

*“No inspection should take place without a reason.”*

Key findings on Inspections:

An annual schedule of inspections performed by the Animal Medicines Inspectorate (AMI), which is part of the VMD, is produced and each inspector in a geographical area is responsible for managing their workload. Inspections are booked with the organisations. At the end of the inspection a feedback discussion is held with the organisation at which the inspector or team will highlight instances of non-compliance. A report is produced within 30 days and the organisation is given 30 days to respond to any issues raised. A degree of flexibility has to be maintained in the schedule to enable enforcement visits.

A ‘risk rating’ is applied to the inspection outcome and a timeframe agreed for the next inspection. Triggers for re-inspection due to exceptional circumstances within the agreed timeframe are also used by the inspectorate.

Memorandums of Understanding with the Medicines and Healthcare products Regulatory Agency (MHRA) with reference to joint inspections of manufacturing sites is evidence of good practice. However the number of joint or delegated inspections, 1500 in 2008/09, would suggest further work to increase the number of joint or delegated inspections should be undertaken.

Two concerns were raised by stakeholders,

- a) The consistency of approach and findings by the individual inspectors.
- b) A conflict in the role of inspector, being both a regulator and a customer care consultant.

Any relevant background information such as the number of inspections and the number of businesses inspected; the regulator’s risk model etc

The VMD has two inspection teams. One is responsible for inspecting premises which manufacture medicines for use in animal health, while the Animal Medicine Inspectorate (AMI) inspects organisations which store, distribute, sell and commercially use the prescribed products.

Directive 2001/82/EC requires that manufacturers are inspected on a 3 year cycle and compliance with Veterinary Regulations specify a 2 year inspection programme.

1,254 scheduled inspections and 144 follow-up/special visits were undertaken in 2008/09. In addition 139 enforcement visits to non-approved sites, 17 to approved sites and 34 residue inspections were completed.

<p>Review findings:</p> <p>The extent to which the review team believes the regulator is acting in line with the Hampton principle:</p>	<p>The VMD is constrained by EU directives which are prescriptive on statutory inspection timeframes. However, it is possible for the VMD to publish the risk analysis used to determine the frequency of inspections.</p> <p>Equally, the triggers for re-inspection due to exceptional circumstances should also be published.</p> <p>The VMD should also consider publishing the list of organisations due for inspection, via an annual prospective schedule. This would allow stakeholders of the inspected organisations to participate if they wanted to. It would also support the implementation of a risk-based approach to inspections and reduce unnecessary visits.</p>
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## SANCTIONS

### ***Hampton & Macrory principles***

*“The few businesses that persistently break regulations should be identified quickly, and face proportionate and meaningful sanctions.”*

*“Regulators should be transparent in the way in which they apply and determine administrative penalties.”*

*“Regulators should avoid perverse incentives that might influence the choice of sanctioning response.”*

*“Regulators should follow up enforcement actions where appropriate.”*

<p>Key findings on Sanctions:</p>	<p>VMD inspectors are empowered to seize illegal and unauthorised products. The organisation or individual then has 28 days in which to submit a claim against the seizure.</p> <p>Suspected Adverse Reactions and Incident reporting are actively encouraged and are followed up by the inspectorate.</p>
<p>Background information such as a summary of sanctions available to the regulator and any data on sanctions imposed by the regulator:</p>	<p>Seizure Notices and Improvement Notices are served against organisations/individuals and are published both on the website and in the hard copy Marketing Authorisation Veterinary Information Service (MAVIS) report. Whilst VMD is not authorised to collect fines, Defra does pursue relevant cases under the Proceeds of Crime Act (POCA).</p> <p>Inspectors are responsible for following up the Improvement Notices with organisations.</p> <p>Where prosecution is considered, the VMD works closely with Defra who has responsibility for taking this forward; collaboration with Trading Standards, HMRC, and trade carriers is often required.</p> <p>The number of Enforcement and Seizure Notices issued is not published in the annual report, nor are they discussed.</p>
<p>Review findings: the extent to which the review team believes the regulator is acting in line with the Hampton principles and Macrory characteristics:</p>	<p>VMD should publish the escalation policy that is followed when it identifies concerns with an organisation. This would increase transparency for the sector.</p>

## FOCUS ON OUTCOMES

### *Hampton principle*

*“Regulators should measure outcomes and not just outputs.”*

<p>Key findings on Focus on Outcomes:</p>	<p>The review team found that there was exceptional clarity in the outcomes being sought through the activities carried out by the Veterinary Medicines Directorate. However, there is scope to broaden this out to ensuring that its activities, using innovation for instance, help pharmaceutical companies and businesses in carrying out their own activities.</p>
<p>Background information such as the regulator’s key objectives:</p>	<p>The VMD sees its mission as ensuring “the responsible, safe and effective use of veterinary medicinal products by protecting public and animal health, the environment and animal welfare by assuring the safety, quality and efficacy of veterinary medicines”.</p> <p>The VMD as an organisation has a clear sense of purpose and this objective is well understood by the industry. Its aims are to:</p> <ul style="list-style-type: none"> <li>• Authorise and monitor veterinary medicines to safeguard their safety and efficacy following authorisation. Authorisations are issued to companies once they have demonstrated to the VMD that their product is of the appropriate quality, can be used safely and will be effective when used in accordance with instructions provided.</li> <li>• Develop, update and enforce the legislation relating to veterinary medicines, controlling them from their point of manufacture, as they are supplied and all the way through to administration. The Veterinary Medicines Regulations which are published annually bring together all of the legislation, including that of European origin, relating to veterinary medicines in the UK.</li> <li>• Monitor foodstuffs derived from animals for residues arising from the use of veterinary medicines and illegal substances.</li> </ul>
<p>Examples of good practice:</p>	<p>The VMD publishes progress made on individual Marketing Authorisation applications against statutory ‘clock days’ which is the time taken to actively consider the application.</p>

	<p>This excludes the time taken to provide further information requested from applicants. The VMD has set itself a target of 120 'clock days' to complete the initial scientific assessment related to Marketing Authorisation and 210 'clock days' to complete all Marketing Authorisation applications. Statistics (including average and quartiles) on achievement against this target are published on its website.</p> <p>The VMD's roles in efficiently dealing with applications relating to both 'blue-tongue' and Bee diseases (Nosema) has been widely acknowledged and praised by stakeholders, such as the National Farmers Union, as playing a key role in tackling such animal disease outbreaks.</p>
<p>The extent to which the review team believes the regulator is acting in line with the Hampton principle:</p>	<p>The VMD is compliant with this Hampton principle but should consider how its specific activities help deliver the broad outcomes that it seeks.</p> <p>For example, it would also be helpful if the VMD published its innovation policy stating how regulatory activities take account of the commercial pressures on manufacturers and businesses to come up with new products. This is especially important for veterinary licence holders when they seek to use medicines that already have Marketing Authorisations in a new way since seeking fresh regulatory approval for these changes can be cost-prohibitive.</p>

## Appendix 1: Review team membership

**Carmel Dodson-Brown** is the Head of Clinical Governance & Patient Safety at the Human Fertilisation and Embryology Authority. Her career has been based in the NHS both at Trust and National level, following the completion of a Risk Management MSc she has focussed on safety and investigations. She is currently participating in the development of a European wide Vigilance & Surveillance system for the Artificial Reproduction Technology sector.

**Andrew Shephard** is an Assistant Director at the Security Industry Authority. He has been responsible for the SIA Approved Contractor Scheme since its introduction in 2006. Andrew's career started as a research scientist in Kodak Limited and has included a number of quality and strategy-related roles in Kodak and in Unilever.

**Olukemi Saka** is an Assistant Director in the Better Regulation Executive in the Department for Business, Innovation and Skills. He is on secondment from HM Treasury where he worked on pensions reform, enterprise policy, small business finance and European economic reform, with a strong emphasis on raising UK long-term productivity growth.

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URN: 10/693

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