

CONSULTATION ON THE REVISION OF THE FOOD LAW CODE OF PRACTICE (ENGLAND), ASSOCIATED PRACTICE GUIDANCE AND REGULATORY IMPACT ASSESSMENT - SUMMARY OF RESPONSES

Background

1. The consultation on the Food Law Code of Practice (England) took place from 21 September to 10 December 2007. The consultation was issued to 389 local authorities in England and other stakeholders with an interest in enforcement issues. A total of 80 substantive responses to the consultation were received.

2. We are grateful for these responses and have taken the comments made into account in finalising the Code of Practice and the supporting Regulatory Impact Assessment (RIA). We are currently finalising the Practice Guidance and will also take the comments made on that into account as part of that process. The full consultation package is available on the Agency's website at:

<http://www.food.gov.uk/consultations/consulteng/2007/foodlawcopengreview07>

Summary of responses

3. A list of stakeholders that responded to the consultation is appended.

4. The table below summarises the responses to the consultation in terms of the specific questions posed and other issues raised under the following headings:

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| Section A | Comments on the draft revised Food Law Code of Practice (England) |
| Section B | Comments on the draft revised Practice Guidance (England) |
| Section C | Comments on the Regulatory Impact Assessment |
| Section D | Comments on the monitoring system |

TABLE SUMMARISING CONSULTATION RESPONSES

Note - This table provides a summary of the consultation responses only. Copies of the individual responses have been filed with the Agency's Library and Information Service.

| Question/issue raised in consultation | Summary of responses | FSA evaluation/response |
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| Section A - Comments on the Food Law Code of Practice (England) | | |
| <p>1. Will the use of the proposed interventions be an effective tool to drive up business compliance with food law?</p> | <p>The views of respondents varied.</p> <p>Many local authority stakeholders agreed that the proposed interventions will be effective in driving up business compliance, and for targeting of resources as long as they are used in a sensible and proportionate manner.</p> <p>Other local authorities, and also the British Retail Consortium (BRC), considered that the proposed interventions mirrored the work already being undertaken by the regulatory authorities and would not, therefore, lead to any substantial change in compliance levels. These respondents believed that other enforcement strategies ('scores on the doors' - SOTD - was given as an example) are more effective in driving up compliance levels.</p> <p>Some respondents also expressed concern that a consequence of the interventions policy was a possible increase in the inconsistency in approach between different local authorities.</p> | <p>On the basis of the evidence that activities other than inspections are effective in driving up levels of compliance by businesses with food law, we propose to proceed with the introduction of an interventions approach in the revised Code.</p> <p>The concerns expressed by some stakeholders have been noted and we will be keeping the Code under review. We will be monitoring business compliance levels and the progress of local authorities in using interventions to ensure that the approach is effective.</p> <p>For those authorities already using a range of interventions, the introduction of this policy will give formal recognition of the activities that they undertake outside formal inspections.</p> <p>We recognise that for many authorities, other initiatives (such as Safer Food Better Business) may also be key to improving standards.</p> <p>We acknowledge that through the increased reliance on an officer's professional judgement, there is potential for inconsistency. This emphasises the need for authorities to have robust management controls in place.</p> |

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| <p>2. Is there sufficient information and examples relating to each monitoring category to clarify how the interventions should be reported, and have we successfully differentiated between the types of interventions?</p> | <p>The majority of local authority respondents did not believe that the different types of interventions that may be used had been differentiated adequately or that sufficient examples had been provided.</p> <p>Similarly, the majority view was there is not sufficient clarity about how different interventions should be reported.</p> <p>Concern was expressed by a significant number of respondents regarding the status of sampling visits on the basis that sampling alone will not provide enough information to determine the level of compliance at a food establishment.</p> | <p>We have published some additional information providing examples of the different intervention types and advice on how intervention types should be reported. This is available at: http://www.food.gov.uk/multimedia/spreadsheets/laemsfhfsinterventions.xls</p> <p>We commissioned a programme of training courses on the use and planning of interventions for local authority lead officers for food hygiene issues.</p> <p>We have considered the comments on sampling and the revised Code aims to address the concerns expressed.</p> |
| <p>3. Should premises which are given a risk rating score of A or B be subject to inspection only, or should these premises be subject to the introduction of interventions?</p> | <p>The majority of respondents considered that high-risk establishments should always be subject to regular inspections, but other types of interventions may be used in addition.</p> <p>A minority of local authority respondents did argue that interventions at category A or B establishments should not be restricted to inspection. Some category B premises, for example care homes, are rated as such only because of the vulnerable group that they serve and that in such cases, the decision as to the most appropriate intervention should be left to the discretion of the enforcement officer.</p> | <p>We have considered this issue carefully and reflected on the views expressed.</p> <p>Category A and B establishments represent a higher risk than other establishments. On this basis, the revised Code will require that the planned interventions for these establishments should be an inspection, partial inspection or audit. This does not preclude local authorities from undertaking additional interventions of other types.</p> |

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| <p>4. The Agency has proposed that enforcement officers will now have the flexibility to change the risk rating of premises following an official control. What are your views on this proposal?</p> | <p>The majority of local authorities believed that there is a current lack of guidance on how this should be undertaken, and this policy will lead to a great deal of inconsistency.</p> <p>It was believed that many of the official control interventions will not provide sufficient information to re-score an establishment. In addition, it was believed that this policy will have further resource implications with the introduction of SOTD schemes.</p> <p>A minority, however, welcomed this proposal as it would re-instate the opportunity for officers to exercise their professional judgement. These respondents believed that this would also be helpful in dealing with re-inspections under SOTD.</p> | <p>We have reflected on the range of views expressed. Under the revised Code, the interventions-rating of an establishment may only be changed following an inspection, partial inspection or audit.</p> <p>The impact on this policy in terms of resources in connection with SOTD will be assessed in more detail as part of the consultation on a UK-wide scheme.</p> |
| <p>5. The Agency invites your views on any anticipated difficulties in ensuring that the intervention policy is applied consistently between different officers in food establishments?</p> | <p>Local authorities had significant concerns in this respect.</p> <p>It was highlighted that the FSA and local authorities should continue to work together to implement and improve mechanisms that are already in place to address consistency issues (e.g. communication systems to share approaches to enforcement, regional fora, role of professional bodies, training, etc.). In addition, it was suggested that it is important to put in place a mechanism that would allow businesses to raise particular grievances.</p> | <p>We acknowledge the importance of consistency in approach and are committed to continuing to work with local authorities to build on and supplement the mechanisms that are already in place, and which aim to address this key issue.</p> <p>Under the Code, authorities are required to maintain robust management controls to ensure individual officers are making reasoned and evidence-based decisions using their professional judgement, and ensuring consistency between officers.</p> <p>The Agency also carries out its own monitoring and auditing of local authorities to ensure these controls are adequate, including 'reality checks' in food businesses to ensure that professional judgments are sound.</p> |

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| <p>6. In measuring 'broad compliance' the new performance system requires establishments to achieve a minimum of ten on all three criteria - structure, food safety management systems, and confidence in management - to prevent food establishments with significant non-compliances being judged broadly compliant. Are you supportive of this change?</p> | <p>The majority of local authorities support this approach and would also like further guidance on what this would look like in practice.</p> <p>The need to align this with other policy issues currently in development, such as SOTD, was highlighted.</p> <p>In addition, some local authorities believed that the Agency has set the bar too low which may lead to resources being directed away from high-risk establishments in attempts to move other businesses to this level.</p> | <p>We propose to provide guidance through the Industry Guides as to what specific establishments will look like if achieving standards commensurate with broadly compliant.</p> <p>We will be mindful of the need to align the option chosen for a national SOTD scheme with the definition of 'broadly compliant'.</p> <p>We agree that local authorities should be targeting resources at high-risk establishments, and that they should comply with the intervention frequencies set out at Annex 5 of the Code.</p> |
| <p>7. Should establishments requiring approval under Regulation (EC) No 853/2004 be subject to the proposed inspection frequency as laid down within section 4.3.4 of the existing Code of Practice?</p> | <p>There was very strong support for this proposal (with only three respondents taking the contrary view).</p> | <p>We propose to proceed to amend the Code such that approved establishments will be assessed in accordance with the interventions-rating scheme set out in Annex 5 of the Code.</p> |
| <p>8. Will the movement of premises requiring approval under Regulation (EC) No 853/2004 back within the risk-rating system free up resources by removing prescriptive inspection frequencies without endangering public health?</p> | <p>The majority of respondents believed this would be the case but that the level of resources that would be freed up was dependent on the number of approved establishments in the local authority area.</p> <p>A small minority of respondents did not agree that there would be any savings.</p> | <p>We propose to proceed to amend the Code such that approved establishments will be assessed in accordance with the interventions-rating scheme set out in Annex 5 of the Code.</p> |

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| <p>9. We would welcome the views of business and local authorities on the proposed changes to the registration form. Will the proposed changes to the registration form reduce the administration burden placed upon new businesses, (estimated currently at 25 minutes per registration form) without endangering public health? (see also point 28 below)</p> | <p>The views of local authorities were split evenly. Just over half of those that commented disputed that the reduction in information on the form will have any realistic effect in reducing burdens. It was believed that the time to fill out the form is grossly overestimated at 25 minutes.</p> <p>The other authorities considered the new form to be less burdensome and highlighted that further information on businesses is currently gathered during inspections anyway. They also believed, however, that the time taken to fill out the form is overestimated at 25 minutes. The changes to the form will not present any danger to public health in their opinion.</p> <p>No comments were received from industry stakeholders in response to the consultation but more informal contact with some industry representatives took place subsequently. The view was that whilst there may be advantages in reducing the information required, there were also benefits in including some elements that had been removed. It was estimated that the revised form would take around five minutes to complete.</p> | <p>We have noted the range of views and the concerns expressed by some authorities. However, we remain committed to reducing the administrative burden on businesses overall, and we believe that the inclusion of a simplified form in the revised Code will contribute to this without compromising public health.</p> |

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| <p>10. Is the level of information required from businesses when completing the registration form appropriate? If not please provide the supporting evidence/justification. (see also point 28 below)</p> | <p>Almost half of the local authorities that responded considered the removal of information requested as a backwards step, and that the current version of the form provides valuable information.</p> <p>Of the others, most believed that the level of information required by the simplified form is satisfactory as other information is obtained during the follow-up visit.</p> <p>The remaining respondents suggested that the simplified form be retained but should also include a requirement to indicate the types of food premises, limited company details, all food business operators associated with the business etc.</p> <p>Some industry representatives were consulted post-consultation and felt that the lack of business type could cause problems and should be included in the revised form.</p> | <p>We have noted the range of views and the concerns expressed by some authorities. However, we remain committed to reducing the administrative burden on businesses overall and we believe that the inclusion of a simplified form in the revised Code will contribute to this without compromising public health.</p> |
| <p>11. Do the proposals contained in this consultation impose any new burdens, or remove existing burdens, on business or local authorities other than those identified in the RIA? (see also point 28 below)</p> | <p>Most local authority respondents believed that the proposals, if implemented, will push the burden away from businesses towards local authorities.</p> <p>Concerns were raised about increased initial costs for IT changes that will be needed, staff training that will have to be provided, and also for the review of internal policies, procedures and stationery etc.</p> | <p>We believe that the introduction of the new IT system will reduce the administration burden in the longer term.</p> |

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| <p>12. Do you feel as a Food Authority enforcing food law, confident in how to apply the suite of interventions, and can you see circumstances where different interventions will be appropriate?</p> | <p>Views of local authorities were split.</p> <p>Around 40% believed that they understood the concept of intervention and welcome the flexibility to apply different interventions where they believe that these would be appropriate and effective.</p> <p>Approximately 10% of those authorities that responded did not feel confident in being able to apply the suite of interventions, and questioned how many of them serve any purpose in ensuring protection of public health.</p> <p>The remainder believed that it would be based upon the further guidance and examples, and training that would need to be provided.</p> | <p>Published research has shown that interventions other than inspection are also effective in improving business compliance. On that basis, we believe that it is important to provide flexibility in the Code for authorities to use this wider range of interventions, and to receive recognition for this.</p> <p>We have already organised a programme of training on interventions for local authorities and are considering whether we need to extend this programme and/or provide guidance.</p> |
| <p>13. Alternative Enforcement Strategies (AES) are not an intervention, rather a method of monitoring compliance at low risk premises. What are your views on the proposal and please state the value and use you would make of AES?</p> | <p>The majority of respondents considered that, given resources, AES are valuable for collection of information that is then used as a basis to assess future action in relation to low-risk food businesses such as childminders.</p> <p>Further guidance on the effective use of AESs was requested. In addition, it was requested that the Agency give consideration to the possibility of extending AES to category D premises.</p> | <p>AES are designed to manage and improve compliance in the lowest risk category premises (category E). Further research on the use of AES was completed at the end of March 2008, and further guidance will be produced on how they can be used effectively.</p> |
| <p>14. Interventions give local authorities the discretion to direct resources at food establishments that present most risk to public health. Will this policy assist in protecting resources at a local level?</p> | <p>The majority of local authorities that responded recognised that there is a risk that the changes may be seen as a relaxation of the inspection regime without the commitment that any released resources need to be redirected to interventions to help drive up compliance in poor premises.</p> <p>A minority believed that this policy will have no effect on protecting resources.</p> | <p>We believe that the new national performance indicator should assist in protecting resources at a local level.</p> <p>The Agency and LACORS has recently published <i>Food matters at your Council: Councillors Handbook</i> that is aimed at raising awareness about food protection issues amongst elected members. This is available at:</p> <p>http://www.lacors.gov.uk/lacors/upload/17351.pdf</p> |

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| <p>15. Changes in the Code have been introduced to complement the Local Authority Enforcement Monitoring System (LAEMS). The next inspection or other type of intervention must be entered as a “bring forward” action at the conclusion of each intervention. What is your view on its practical application?</p> | <p>This was considered difficult to answer as this was dependent on the success of the implementation of the new IT systems.</p> <p>There was agreement among respondents that the system needs to take into account the fact that many food businesses will have changed circumstances by the next intervention, making the previously selected intervention inappropriate, or generally need to change strategy on the spot. It was highlighted that, consequently, any system will require flexibility.</p> | <p>We believe that LAEMS and the revised Code will provide the flexibility needed.</p> <p>Authorities will be required to record the date of the next due intervention on their database. LAEMS does not require them to record the next type of intervention due. Authorities are, therefore, able to decide on the most appropriate type of intervention - with regard to the Code - based on intelligence about the establishment, which may be received in the time since the most recent intervention.</p> <p>Notwithstanding this, it may assist authorities with resource planning if they do record the next type of intervention planned.</p> |
| <p>16. It was proposed that new provisions giving direction on the approach to interventions and enforcement at the level of primary production be included in the revised Code.</p> | <p>The Trading Standards Institute expressed concern at the lack of guidance in relation to division of responsibilities as regards arable food production premises or where regulatory work will be carried out (at least in part) by other agencies (such as Animal Health (Dairy Hygiene)), or on premises which incorporate growing, harvesting, cleaning packing and selling operations on one site (particularly where the product may be eaten without further processing i.e. fruits and salads). It was suggested that it may be appropriate to provide such guidance in the Practice Guidance.</p> <p>The Institute noted that establishments at primary production level are not covered by the risk-rating scheme at Annex 5 of the Code but that various factors need to be taken into consideration in assessing risk for such establishments. It was suggested that guidance on the weight that should be placed on these factors would be useful to enable a consistent approach by all authorities.</p> | <p>We agree that the division of responsibility for regulatory and enforcement activities at the level of primary production could be explained in the Practice Guidance and the revised document will reflect this.</p> <p>We note the comments regarding the factors that are assessed in determining the inspection frequencies of establishments at the level of primary production, and will consider whether we can also provide further guidance on this in the Practice Guidance.</p> |

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| 17. Some amendments were proposed in respect of the direction given in relation to quick-frozen foodstuffs in order to reflect changes to legal requirements in this area (Chapter 3.7 of the Code). | No responses were received in relation to the proposed changes. | We propose to make the changes to this Section of the Code. |
| 18. The Code was amended to provide for the use of Permanent Transport Authorisation in relation to live bivalve molluscs. | No responses were received in relation to this proposal. | We propose to include this provision in the revised Code. |
| 19. It was proposed that a checklist be included in the Code for use in relation to hygiene inspections of fishing vessels. | No responses were received in relation to the proposed checklist. | We are still considering this issue and are discussing the checklist with relevant stakeholders so we will not proceed to include it in the Code at this stage. |
| 20. Lack of availability of inspection forms currently held on the LACORS website. | The BRC highlighted that in order to ensure transparency, the inspection forms used by local authorities should be available to industry but are currently held on the 'closed' part of the LACORS website. | LACORS has responded to this and all inspection forms are now accessible to the public. |

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| <p>21. Fitness for purpose of the risk rating system at Annex 5 of the Code</p> | <p>Some respondents questioned why the consultation did not consider the fitness for purpose of the existing risk-rating scheme, particularly given the Agency is proposing to introduce a national SOTD scheme.</p> <p>Others questioned why the frequencies for food hygiene and for food standards inspections could be the same and why initial inspections are always needed for category E rated premises. It was suggested that such businesses could go straight into an AES if enough information is ascertained via a desk-top rating exercise. Both of these options would help resources to be targeted at the higher risk premises.</p> <p>The reasoning behind changing references in the current Code from 'food safety management' to 'food safety management procedures' was also questioned.</p> | <p>We will ensure that the national SOTD scheme adopted is consistent with the interventions-rating scheme in the revised Code.</p> <p>Under European legislation, all food businesses require inspection at some time.</p> <p>The references to 'food safety management systems' have been updated in order to be consistent with the European legislation on food hygiene.</p> |
| <p>22. Qualifications for local authority officers undertaking interventions and enforcement in respect of establishments at the level of primary production.</p> | <p>Trading Standards colleagues highlighted that the DCATS qualification (Diploma in Consumer Affairs and Trading Standards, the legal requirement to be a fully-qualified TSO) has replaced the Diploma in Trading Standards and that this should be reflected in the Code.</p> | <p>We have updated the Section in the Code which specifies the qualification requirements for officers undertaking interventions and enforcement at the level of primary production to reflect this point.</p> |
| <p>23. Inclusion in the Code of the requirements for official controls and enforcement at the level primary production.</p> | <p>LACORS raised concerns about the inclusion of the enforcement of food hygiene at the level of primary production into the general text of the Code. They advocated that a separate annex on primary production would be simpler and unify all of the changes relating to primary production.</p> | <p>When developing the primary production enforcement regime we did consider creating a separate primary production annex as suggested. On balance, however, it was decided that inclusion within the general text would be the most practical option. A number of comments made in the consultation to improve the clarity of the advice given have been reflected in the revised Code.</p> |

| Question/issue raised in consultation | Summary of responses | FSA evaluation/response |
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| Section B - Comments on the Food Law Code Practice Guidance (England) | | |
| <p>24. Is the application form for approval set out in Annex 11 of the Practice Guidance sufficiently flexible for use in relation to small businesses in a proportionate way?</p> | <p>There was an even split of views from local authorities on this issue. Many requested a simplified form which would be more applicable to small businesses, as it requires a lot of an officer's time in giving advice on how to complete the form. It was suggested that a web-based, interactive form that could guide a business through the process would be useful.</p> <p>Other local authorities viewed the form as already being sufficiently flexible as it provides focus to businesses on the various requirements required of establishments seeking approval under Regulation (EC) No 853/2004.</p> | <p>The Agency is currently undertaking a detailed review of the support and guidance that It provides to local authorities and businesses in this area. The responses received on this point will be considered as part of that review.</p> <p>The contents of the approval form and the manner by which it is made accessible to businesses will also be addressed as part of that review.</p> |
| <p>25. The Agency is considering the need to provide additional guidance on the requirements for approval and the scope of exemptions, particularly in relation to small-scale establishments. We would welcome views on issues relating to approval where additional guidance would be helpful.</p> | <p>Local authorities supported the need for guidance in these areas. Support for additional guidance on what establishments are exempt was particularly strong.</p> | <p>The Agency is currently undertaking a detailed review of the support and guidance that It provides to local authorities and business in this area and the responses received on this point will be considered as part of that review.</p> |
| <p>26. Section 4, Chapter 4.1: Interventions This section of the guidance was amended to support the introduction of the new policy of intervention.</p> | <p>No responses were received in relation to the proposed changes.</p> | <p>We propose to proceed with changes to this Section of the Practice Guidance, reflecting the post-consultation amendments to the Code.</p> |
| <p>27. Section 3, Chapter 3.7: Quick-frozen foodstuffs. This section of the guidance was updated in line with changes to the legislative requirements.</p> | <p>No responses were received in relation to the proposed changes.</p> | <p>We propose to proceed with changes to this Section of the Practice Guidance, reflecting the post-consultation amendments to the Code.</p> |

| Question/issue raised in consultation | Summary of responses | FSA evaluation/response |
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| Section C - Comments on the Regulatory Impact Assessment | | |
| <p>28. The Agency sought views from stakeholders on the costs and benefits outlined in the RIA, and in particular with regard to:</p> <ul style="list-style-type: none"> • the estimated costs associated with food service managers understanding and adapting their service or work plans to reflect the introductions of interventions; and • the estimated time and cost of gathering the information required to complete and submit the new registration form. <p>(see also points 9 and 10 above)</p> | <p>As regards service and work plans, six local authority respondents believed that the estimate of 37 hours is low. However, no suggestions were made as to a more realistic estimate.</p> <p>As regards the registration issue, local authorities questioned the estimated 25 minutes for a food business to complete the registration form in Annex 8 of the Code, with many believing that it takes as little as five minutes.</p> <p>Business groups consulted after the close of the formal 12 week consultation were of the opinion that the final version would now take an estimated five minutes to complete.</p> | <p>These comments have been noted and have been reflected in the full RIA.</p> |
| Section D - Comments on the monitoring system. | | |
| <p>29. Proposed change to the monitoring system – in conjunction with the suggested change to the definition of ‘broadly compliant’, the assessment of ‘broadly compliant’ used by the LAEMS system will be changed from a collective score of 30 to an individual score of 10 in each of the three risk factors.</p> <p>(See also point 6 above)</p> | <p>No responses were received in relation to this proposal.</p> | <p>We propose to proceed with changes to the monitoring system.</p> |

LIST OF INTERESTED PARTIES RESPONDING TO THE CONSULTATION

Allerdale Environmental Health Unit
Berkshire Food Liaison Group
Birmingham City Council
Bristol City Council Public Health Services
British Retail Consortium
Buckinghamshire Food Group
Central England Trading Standards Authority
Charnwood Borough Council
Cheshire Food Safety Group
City of Westminster
Cumbria Food Group
Derbyshire Food Liaison Group
Dorset County Council
Durham Food Liaison Group
East Midlands Trading Standards
East of England Trading Standards
East Riding of Yorkshire Unitary Authority
Food and Drink Federation
Forum of Private Business
Gloucestershire Food Safety Group
Greater Manchester Food Liaison Group
Herefordshire & Worcestershire Food Liaison Group
Hampshire County Council
Hampshire Food Advisory Committee
Hertfordshire and Bedfordshire Food Liaison Group
Hull Trading Standards.
Isle of Wight Council
Kingston upon Hull City Council
Kirklees Borough Council
LACORS
Leeds City Council
Leicester City Council
Leicestershire Food Liaison Group
London Borough of Barnet
London Borough of Brent
London Borough of Greenwich
London Borough of Lambeth
London Borough of Southwark
Luton Borough Council
Association of Master Bakers
Merseyside Borough Council
Milton Keynes Borough Council
National Childminding Association
National Framers Union
Nigel O'Grady
Norfolk Food Liaison Group
North Cornwall District Council
North East Lincolnshire Council
North East London Sector Approval Liaison Group
North East Sector Food Safety Liaison Group
North Lincolnshire District Council
North Somerset District Council
Northumberland Food Liaison Group
Oldham MBC
Preston District Council
Ribble Valley Borough Council
Rochdale MBC
Rother District Council
Salford City Council
SEAFISH
Solihull MBC
South Somerset District Council
South Yorkshire LACORS Food Liaison Group
Southend Borough Council
Staffordshire Food Liaison Group
Steve Ramm
Suffolk Food Liaison Group
Surrey Food Liaison Group
Sussex Food Liaison Group
Swale Borough Council
South West of England Regional Coordination of Trading Standards
Tandridge Borough Council
Trading Standards North West
Trading standards South East
Trafford Borough Council
TSI (Trading Standards Institute)
Tyne and Wear Food Liaison Group
Welwyn Hatfield Council
Wigan MBC
Wiltshire Food Liaison Group
Yorkshire & Humber Trading Standards group