**Consultation response form on proposed amendments to the Food Law Code of Practice and Practice Guidance (Northern Ireland)**

Responses to this consultation are required by **23:59 on 19 May 2025**. Please state in your response whether you are responding as a private individual or on behalf of an organisation/company (including details of any stakeholders your organisation represents).

Completed consultation response forms should be emailed to CodeReviewResponses@food.gov.uk.

**Name:** Click or tap here to enter text.

**Organisation:** Click or tap here to enter text.

**Email:** Click or tap here to enter text.

**Questions in relation to proposals 1 to 6**

**In relation to proposal 1, an updated risk-based approach to the prioritisation and timescales for undertaking initial official controls of new food establishments:**

**Question 1a.** Do you consider that the approach will provide Competent Authorities with the ability to deploy current resources more effectively? If not, why not? (Please specify any aspects of the proposal which requires further consideration, and why).

Click or tap here to enter text.

**Question 1b.** It is proposed that, for food hygiene, timescales are provided for initial official controls of all establishments. For food standards, timescales are currently only provided for the highest risk establishments in the Code, with timescales for lower risk establishments provided in separate guidance. Would you agree or disagree with moving the food standards timescales into the Code in the future, so all timescales are in one document? Please describe the main reasons for your answer.

Click or tap here to enter text.

**Question 1c.** Proposal 1 relates to the timescales for initial official controls. No changes to the timescales for due official controls are proposed as part of this consultation, these will remain, as currently, at 28 days for all establishments. However, to assist us in planning future policy in relation to the timescales for due official controls, do you agree or disagree with keeping the timescales at 28 days? Please describe the main reasons for your answer.

Click or tap here to enter text.

**In relation to proposal 2, enabling, in certain circumstances, an establishments food hygiene intervention rating to be amended following a wider range of official control method and techniques including those undertaken remotely:**

**Question 2a.** Do you consider that the proposal will enable Competent Authorities to deploy current resources more effectively? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**Question 2b.** If responding on behalf of a Competent Authorities, would you, if implemented, utilise the flexibility to undertake some methods and techniques remotely? If not, why not?

Click or tap here to enter text.

**In relation to proposal 3, extending the activities that officers, who do not hold a ‘suitable qualification’ for food hygiene or food standards, can, if competent, undertake:**

**Question 3a.** Do you consider that the flexibilities will enable Competent Authorities to deploy resources more effectively? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**Question 3b.** If responding on behalf of a Competent Authorities, would you, if implemented, utilise this flexibility and authorise officers, if competent, to undertake additional activities, and if so, how many officers would you anticipate authorising? If not, why not?

Click or tap here to enter text.

**In relation to proposal 4, a clarification in approach to interventions at food business establishments that fall into risk category E for food hygiene:**

**Question 4.** Do you consider that the proposed approach will provide clarity and consistency in the frequency of official controls at these establishments? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**In relation to proposal 5, removal of the prescriptive number of hours required for continuing professional development (CPD):**

**Question 5.** Do you consider that the approach will provide Competent Authorities with greater flexibility to determine appropriate levels of CPD and training that officers undertake? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**In relation to proposal 6, other amendments to reflect legislative change, provide clarity, improve consistency and keep pace with current practices:**

**Question 6a.** Do you consider that the examples of where the additional score of 22 for vulnerable risk groups would not be used, provides further clarity and will improve consistency in the application of the score? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**Question 6b.** Do you agree that the inclusion of additional descriptors, regarding food safety culture, in part 3 of the food hygiene intervention rating scheme, will provide clarification in the assessment of food safety culture? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**Question 6c.** Do you consider that the clarification within the food hygiene intervention rating scheme about how allergen cross-contamination is taken into account will improve consistency?  If not, why not? (Please specify any aspects of the proposal which require further consideration, and why)**.**

Click or tap here to enter text.

**Question 6d.** Do you consider that moving the guidance on parts two and three of the food hygiene intervention rating scheme from the FHRS Statutory Guidance to the Practice Guidance will improve clarity as to where the guidance can be found? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**Question 6e.** Do you have any objections to the inclusion of the following qualifications within the Code:

* Trading Standards Professional Apprenticeship with the food module as an appropriate qualification for food standards
* Degree in Environmental Health awarded by the Dublin Institute of Technology (awarded from June 2012 onwards)
* Degree in Environmental Health awarded by the Technological University Dublin

If you have any objections, please provide reasons for these. (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**Question 6f.** Do you consider that the amendments to the terminology in the Code and Practice Guidance has improved clarity and consistency between the documents? If not, why not? (Please specify which sections and any aspects of the proposal that require further consideration, and why).

Click or tap here to enter text.

**Question 6g.** Do you agree or disagree with the proposal to remove references to the Competency Framework from the Code but retain references to it in the Practice Guidance to enable the revised approach to competency assessment as set out in the draft Code? Please describe the main reasons for your answer. (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**Question 6h.** Do you agree or disagree with the removal of references to the Practice Guidance and Framework Agreement from the Code? Please describe the main reasons for your answer. (Please specify any aspects of the proposal which require further consideration, and why).

Click or tap here to enter text.

**Additional comments and suggestions**

**Question 7.** Do you have any additional relevant comments or suggestions regarding the draft Code and Practice Guidance?

Click or tap here to enter text.

**Questions in relation to impacts**

**In relation to impacts:**

**Question 8a.** Do you agree or disagree with our assessment of the impacts on Competent Authorities and our assumptions on familiarisation and training resulting from the proposed changes to the Code? Please describe the main reasons for your answer.

Click or tap here to enter text.

**Question 8b.** Do you agree or disagree with our assessment of the impacts on Competent Authorities in relation to changes to procedures? Please describe the main reasons for your answer.

Click or tap here to enter text.

**Question 8c.** If responding on behalf of a Competent Authority, how long would you estimate that it will take to update local policies and procedures if the proposals were implemented? If providing an estimate, please explain which proposal (or proposals) it relates to.

Click or tap here to enter text.

**Question 8d.** Do you foresee any other impacts from the implementation of the main proposals detailed beyond those we have identified? Where possible, please explain your views, which proposal (or proposals) they relate to, and provide quantifiable evidence (for example, costs associated with updating your administration systems, existing procedures, the benefits of greater flexibility to allocate staff to activities.)

Click or tap here to enter text.

**Questions in relation to future potential developments - Qualifications**

**Question I.** Do you consider that moving the list of FSA endorsed qualifications to the Practice Guidance could provide flexibility to recognise new qualifications more expediently without reducing the professional standards subject to an agreed and published governance procedure being in place? If not, please provide your reasons and evidence of the impact you think this will have.

Click or tap here to enter text.

**Question II.** What do you perceive to be the advantages, disadvantages and impacts if we move the list of qualifications from the Code to the Practice Guidance?

Click or tap here to enter text.

**Question III.** Is there an alternative way that we could more expediently update the list of FSA endorsed qualifications from the one presented?

Click or tap here to enter text.

Thank you on behalf of the Food Standards Agency for participating in our consultation of the review of the Food Law Code of Practice and Practice Guidance.