**Response template for consultation on the review of the Food Law Code of Practice & Practice Guide - England**

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:**

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

**Do you consider that the approach will provide CAs 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**. **In relation to proposal 1, an updated risk-based approach to the prioritisation and timescales for undertaking initial official controls of new food establishments:**

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

**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.

**Question 2a. 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:**

**Do you consider that the proposal will enable CAs 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. 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:**

**If responding on behalf of a CA, 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.

**Question 3a. In relation to proposal 3, extending the flexibilities as to who can undertake official controls and other official activities:**

**Do you consider that the flexibilities will enable CAs 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. In relation to proposal 3, extending the flexibilities as to who can undertake official controls and other official activities:**

**If responding on behalf of a CA, 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.

**Question 4. In relation to proposal 4, a clarification in approach to interventions at category E establishments, 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.

**Question 5. In relation to proposal 5, the changes to the amount of training and CPD that officers undertake on an annual basis, do you consider that the approach will provide CAs 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.

**Question 6a. In relation to proposal 6 - other amendments which provide clarity, improve consistency and keep pace with current practices:**

**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. In relation to proposal 6 - other amendments which provide clarity, improve consistency and keep pace with current practices:**

**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 6c. In relation to proposal 6 - other amendments which provide clarity, improve consistency and keep pace with current practices:**

**Do you consider that moving the guidance on parts two and three of the food hygiene intervention rating scheme from the FHRS Brand Standard to the PG 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 6d. In relation to proposal 6 - other amendments which provide clarity, improve consistency and keep pace with current practices:**

**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**
* **Trading Standards Professional Apprenticeship with the animal feed module as an appropriate qualification for food hygiene at the level of primary production**
* **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 do 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 6e. In relation to proposal 6 - other amendments which provide clarity, improve consistency and keep pace with current practices:**

**Do you consider that the amendments to the terminology in the Code and PG 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 6f. In relation to proposal 6 - other amendments which provide clarity, improve consistency and keep pace with current practices:**

**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 PG 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 6g. In relation to proposal 6 - other amendments which provide clarity, improve consistency and keep pace with current practices:**

**Do you agree or disagree with the removal of references to the PG 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.

**Question 7a. In relation to impacts:**

**Do you agree or disagree with our assessment of the impacts on CAs 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 7b. In relation to impacts:**

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

Click or tap here to enter text.

**Question 7c. In relation to impacts:**

**If responding on behalf of a CA, 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 7d. In relation to impacts:**

**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 1. Do you consider that moving the list of FSA endorsed qualifications to the PG 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 2. What do you perceive to be the advantages, disadvantages and impacts if we move the list of qualifications from the Code to the PG?**

Click or tap here to enter text.

**Question 3. 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.