

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

Launch date: 24 February 2025

Respond by: 19 May 2025

This consultation will be of most interest to

- Competent Authorities – district councils
- Food businesses and industry trade bodies
- Awarding bodies for environmental health professionals
- Trade Unions and expert groups may also have an interest

Purpose of the consultation

To seek stakeholder views on the proposed changes to the Food Law Code of Practice (the Code) and Practice Guidance (PG).

Key proposals include:

1. an updated risk-based approach to the prioritisation and timescales for undertaking initial food hygiene official controls of new food establishments
2. enabling, in certain circumstances, an establishments food hygiene intervention risk rating to be amended following a wider range of official control methods and techniques, including those undertaken remotely
3. extending the activities that officers, who do not hold a 'suitable qualification' for food hygiene or food standards, can, if competent, undertake
4. a clarification in approach to interventions at food business establishments that fall into risk category E for food hygiene
5. removal of the prescriptive number of hours required for continuing professional development (CPD)
6. other amendments to reflect legislative change, provide clarity, improve consistency and keep pace with current practices

How to respond

Please use the consultation response form below to provide your comments:

[Consultation response form](#)

The consultation response form should then be emailed to

CodeReviewResponses@food.gov.uk

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Details of consultation

Introduction

In Northern Ireland, district councils are Competent Authorities (CAs) responsible for verification and enforcement of compliance with food law in the majority of food businesses. The Food Standards Agency (FSA) is responsible for providing advice and guidance on the approach that CAs should take, and this is set out in the statutory Code which is issued by the Department of Health. Additionally, the PG is issued to assist CAs with the discharge of their statutory duty to enforce food law. It is non-statutory, complements the Code, and provides general advice on the approach to enforcement of the law.

CAs have a legal obligation to have regard to the provisions in the Code in relation to the delivery of official controls. The Code requires regular review and revision to ensure that it reflects current priorities, policy and legislative requirements so that CAs delivery of food control activities remain effective, consistent and proportionate.

This consultation provides stakeholders with an opportunity to comment on the proposals, which are outlined below. Parallel consultations are also being undertaken in [England](#) and [Wales](#).

Background

The food landscape has changed dramatically in the three decades since the current food hygiene regulatory system was introduced, as has the way we buy and consume food. These changes create new opportunities for us to better protect consumers' interests. We want to make sure CAs can target their resources as effectively as possible and ensure that every intervention adds value and drives compliance.

Having assessed the [challenges with the current model](#), in [September 2022](#), the FSA Board endorsed the headline policy proposals for a revised Food Hygiene Delivery Model (FHDM). During the spring of 2023, we held a 12-week consultation on the initial draft proposed developments for a modernised FHDM across [Northern Ireland](#), [England](#) and [Wales](#). As part of the consultation, we held nine local authority (LA) engagement events across the three nations and an online webinar. We also attended some industry group meetings. We received 114 consultation responses and gathered over 2,000 pieces of feedback from across the three nations.

The proposed developments consulted on in September 2023 were:

- a modernised food hygiene intervention rating scheme, including a decision matrix to determine the appropriate frequency of these controls based on the risk posed by a food business establishment

- an updated risk-based approach to the timescales (where not prescribed in legislation) for initial official controls of new food establishments, and undertaking due official controls
- increased flexibility as to the methods and techniques of official controls that can be used to risk rate an establishment, including the use of remote official controls
- extending the activities that officers, such as regulatory support officers, who do not hold a 'suitable qualification' for food hygiene can, if competent, undertake

Our published [response](#) to the consultation captured stakeholders mixed views on some elements of the proposed developments. As a result of the consultation, we decided not to progress the proposals which required piloting, or significant changes to management information systems (MIS) until further information about associated costs was available from the roll out of the Food Standards Model in Northern Ireland and England. Instead, we decided to focus on further developing the policy proposals which had broad support and could be implemented without piloting. These are included in the main proposals for this consultation.

Main proposals

The main proposals in this consultation are:

- 1) an updated risk-based approach to the prioritisation and timescales for undertaking initial food hygiene official controls of new food establishments
- 2) enabling, in certain circumstances, an establishments food hygiene intervention risk rating to be amended following a wider range of official control methods and techniques, including those undertaken remotely
- 3) extending the activities that officers, who do not hold a 'suitable qualification' for food hygiene or food standards can, if competent, undertake
- 4) a clarification in approach to interventions at food business establishments that fall into risk category E for food hygiene
- 5) removal of the prescriptive number of hours required for CPD
- 6) other amendments which reflect legislative change, provide clarity, improve consistency and keep pace with current practices

Policy objectives

The proposals set out in this consultation are intended to:

- enhance more effective use of CA resource by:
 - prioritising official controls at highest risk establishments
 - removing unnecessary barriers to official control delivery, including widening the cohort of professionals that can undertake certain activities

- enabling greater use of existing flexibilities as well as, where appropriate, the use of remote official controls
- increase consistency in the delivery of official controls by providing clarification on existing policy
- ensure the continued protection of public health and consumer confidence, including in relation to the food hygiene rating scheme (FHRS)

Detailed proposals

Proposal 1: An updated risk-based approach to the prioritisation and timescales for undertaking initial food hygiene official controls of new food establishments

Current approach

The current [Code](#) (issued May 2023) provides that, in relation to food hygiene, an initial inspection of new food business establishments must occur within 28 days of registration, or when the CA becomes aware that the establishment is in operation, whichever is the sooner. The Code also provides that CAs must use information supplied by food business operators (FBOs) when registering their food business establishments to determine when to carry out an initial inspection.

The current [PG](#) (issued March 2021), provides that, where the establishment is believed to be low risk, consideration can be given to postponing the initial inspection, in circumstances where conducting it would delay planned interventions to premises involved in high-risk activities. Furthermore, where an establishment has registered 28 days before the commencement of operations, the inspection can be delayed until operations have begun.

Proposed approach

It is proposed that CAs use the information supplied by FBOs to assess the potential inherent risk of new food business establishments and apply a more risk-based approach to the timescales for undertaking initial official food hygiene controls. This aligns with the approach taken for food standards.

It is also proposed that the CA may, in certain circumstances, use any method and technique of official control (individually or a combination thereof), provided for in article 14 of Regulation (EU) 2017/625, whether undertaken physically or remotely. This would not apply to those establishments with a potential high inherent risk score, those within scope of the FHRS, or those subject to approval.

It is proposed that CAs review the information supplied by FBOs when registering a new food business establishment (referred to as an initial desktop assessment) within 28 days of registration, or from when the CA becomes aware that the establishment is in operation, whichever is the sooner.

The initial desktop assessment would use any information supplied by the registering FBO and any other information the CA deems relevant, to assess an establishments potential hazard score and determine when to undertake the initial official control. This potential hazard score is provided in part 1 of the food hygiene scoring system (set out in [Annex 1](#) of the Code) which includes the following elements:

- type of food and method of handling
- method of processing
- consumers at risk, including consideration of vulnerable risk groups

The scores from these three elements, when added together, would give the overall ‘potential hazard’ score.

The FSA’s Register a Food Business Service (RAFB) was enhanced in summer 2024, with new questions added to gain information on the three elements listed above, which will assist CAs when reviewing information supplied by the FBO.

It is also proposed that the initial desktop assessment is an activity that can be undertaken by officers not holding a ‘suitable qualification’ as long as they are competent.

When an establishment’s potential hazard score has been determined, it is proposed that an initial official control would be undertaken within the timeframes set out in table 1, using appropriate methods and techniques.

Table 1: Timescales and methods and techniques for initial official food hygiene controls

Potential hazard score	Timescales to undertake initial official control	Appropriate methods and techniques of official controls
30 – 97	Initial official control undertaken within 28 days of the establishment commencing operations, or from the initial desktop assessment being carried out, whichever is the sooner	A physical inspection or audit (whether full or partial)
5 – 29	Initial official control undertaken, on a risk basis, within 3 months of the establishment commencing operations, or from the initial desktop assessment being carried out, whichever is the sooner	A physical inspection or audit (full or partial) should be conducted where a CA is legally required to provide a food hygiene rating to an establishment. Otherwise, the CA may use any method and technique of official control (individually or a combination thereof), provided for in article 14 of Regulation (EU) 2017/625, whether

		<p>undertaken physically or remotely, as long as they:</p> <ul style="list-style-type: none"> • are effective and appropriate in the circumstances • verify compliance with relevant food law • enable validation of the desktop assessment
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Where CAs become aware that a business is trading, but not registered, an initial official control should be undertaken within the above timescales, starting from the date they became aware of the establishment.

It is proposed that, as currently, CAs prioritise initial official controls of new food business establishments, so that those with a lower potential hazard do not cause undue delays to the delivery of initial or due official controls at higher risk and/or non-compliant establishments. For example, if as part of the initial desktop assessment, information indicates potential non-compliance at an establishment, this information may be used to prioritise the initial official control at that establishment, even though this would not necessarily impact the establishment's potential hazard score. This prioritisation approach is consistent with that currently taken to initial food standards controls.

The proposal regarding the methods and techniques of official controls that can be utilised, means that, for higher risk establishments (those with a potential hazard score of between 30-97), CAs would, as currently, undertake a physical inspection or audit (whether full or partial) within 28 days of the establishment commencing operations, or from the initial desktop assessment being carried out (whichever is the sooner).

For lower risk establishments (those with a potential hazard score of between 5-29), CAs would undertake an initial official control, on a risk basis, within 3 months of the establishment commencing operations, or from the initial desktop assessment being carried out (whichever is the sooner). However, the method and technique of official controls used could differ depending on the type of establishment.

CAs would have the flexibility to use any of the methods and techniques of official control set out in article 14 of Regulation (EU) 2017/625, whether physical or remote, albeit not when providing a [mandatory food hygiene rating](#) to the establishment.

When determining appropriate and effective methods and techniques, it is proposed that CAs would take into consideration factors such as, the purpose of the official control, familiarity with the establishment and whether the FBO is capable of receiving an official control remotely. The flexibility to determine the methods and techniques to use would not preclude a CA from undertaking a physical inspection at these establishments, if they choose to.

The timescales and the flexibility on the methods and techniques included in this proposal would not apply to establishments subject to approval under [Regulation \(EC\)](#)

[No 853/2004](#) or the requirements of [Regulation \(EU\) No 210/2013](#) on the approval of establishments producing sprouts, which would continue to receive an initial on-site visit as soon as practicable.

Table 2 provides examples to demonstrate how the proposed approach would differ from the current approach in relation to different types of food business establishment.

Table 2: Comparison of timescales and methods and techniques for undertaking initial official food hygiene controls at different types of food business establishments

Business type	Current timescales and intervention type	Proposed timescales and intervention type
Pub serving food	Physical inspection within 28 days of registration	Physical inspection or audit (whether full or partial) within 28 days of desktop assessment
Home caterer, making small number of cakes supplied direct to final consumer	Physical inspection within 28 days of registration	Physical inspection or audit (whether full or partial) within three months of desktop assessment
Food broker who takes legal ownership of food, but never takes physical ownership	Physical inspection within 28 days of registration	Any method and technique of official control (physical or remote) as long as appropriate and effective in the circumstances, within three months of desktop assessment
Sports retailer selling small selection of prepacked chocolate	Physical inspection within 28 days of registration	Any method and technique of official control (physical or remote) as long as appropriate and effective in the circumstances, within three months of desktop assessment

Rationale for change

In 2017 the FSA commissioned [research](#) to inform work on the modernisation of the risk intervention rating systems for UK food establishments. This found that CA officers saw the requirement to undertake an initial inspection of all establishments within 28 days as not being risk-based and a drain on resources, particularly in urban areas with significant

business churn. Many officers said they would welcome the removal of this requirement and the enabling of alternative approaches, such as desktop risk assessments.

As part of the consultation on a modernised FHDM a risk-based approach to the timescales for undertaking initial official controls, with triaging of new food business establishments, was proposed.

Feedback from the consultation demonstrated that, on balance, the ability to triage and prioritise official controls according to risk was welcomed. However, it was considered that the proposed development for the modernised FHDM was overcomplicated.

Taking into account the feedback, a simplified risk-based approach, which is consistent with the food standards delivery model, has been proposed.

The proposed approach enhances the current provision within the Code that CAs use information supplied by FBOs when registering their food business establishments to determine when to carry out an initial inspection. It also enables the use of a wider range of methods and techniques of official control, including those undertaken remotely, while safeguarding FHRS.

The proposed approach would enable CAs to use their resources effectively by focusing on the highest risk establishments, while still ensuring all establishments are subject to initial official controls within appropriate timescales.

Based on the [2019-20 LAEMS data](#) and the data provided by CAs to the FSA for the year 2022-2023, 50.6% of existing establishments in Northern Ireland have a potential hazard score of less than 29, and would have fallen into the three month timescale for an initial official control. Of these establishments, 99.8% of them fell into risk category D and E. The data also provides that over 99% of these category D and E establishments are broadly compliant (as defined in the Code).

This demonstrates that, based on the potential hazard scores, CAs would be prioritising initial official controls at establishments likely to be risk rated A, B or C, and that, based on levels of compliance, the proposed approach would not have a negative impact on public health.

Additionally, officers not holding a 'suitable qualification' for food hygiene, but who are competent, would be able to undertake the desktop assessment of new establishments, which further enables effective use of CA resources.

Proposal 2: Enabling, in certain circumstances, an establishment's food hygiene intervention risk rating to be amended following a wider range of official control methods and techniques, including those undertaken remotely

Current approach

Flexibilities

Article 9 of Regulation (EU) 2017/625, and the current Code, provide that CAs must ensure they perform official food controls on all operators regularly, on a risk basis and with appropriate frequency.

The current Code prescribes the methods and techniques of official controls that can be used by CAs for food hygiene, which are based on the risk of an establishment. Flexibilities are provided, enabling CAs to choose which methods and techniques of official controls to use at lower risk establishments. The current approach, and available flexibilities, have been set out in table 3.

This differs to the current approach for food standards, which enables establishments, other than those categorised as priority interventions, to receive any method or technique of official control, including those undertaken remotely, as long as they are effective and appropriate in the circumstances. Those establishments that are categorised as priority interventions, would receive an inspection, partial inspection, or audit.

Revision of food hygiene intervention rating

The current Code provides that a food hygiene intervention rating can only be revised at the conclusion of an inspection or audit, partial or full, and where sufficient information has been gathered to justify the revision of the rating.

Proposed approach

Flexibilities

It is proposed that the flexibilities currently available are clarified to explain which type of official control or non-official control can be used and when, and to introduce the option for use of remote official controls, where they are effective and appropriate in the circumstances. Table 3 compares the current flexibilities against those being proposed.

Table 3: Comparison of current flexibilities against those being proposed

Food hygiene intervention rating	Current approach	Proposed approach
A or B	Inspection, partial inspection or audit	Physical inspection or audit (whether full or partial)
C (non-broadly compliant)	Inspection, partial inspection or audit	Physical inspection or audit (whether full or partial)
C (broadly compliant)	Alternate between: <ul style="list-style-type: none"> inspection, partial inspection or audit; and another type of official control 	Alternate between: <ul style="list-style-type: none"> physical inspection or audit (whether full or partial); and any method and technique of official control (individually or a combination thereof), provided for in article 14 of Regulation (EU) 2017/625, whether undertaken physically or remotely
D (establishments scoring 30 or 40 for type of food and method of handling ¹)	Alternate between: <ul style="list-style-type: none"> inspection, partial inspection or audit; and other types of interventions 	Alternate between: <ul style="list-style-type: none"> physical inspection or audit (whether full or partial); and any method and technique of official control (individually or a combination thereof), provided for in article 14 of Regulation (EU) 2017/625, whether undertaken physically or remotely; or a non-official control, which can be undertaken physically or remotely
D (establishments scoring 5 or 10 for type of food)	Alternate between: <ul style="list-style-type: none"> an official control; and an intervention that is not an official control 	Alternate between: <ul style="list-style-type: none"> any method and technique of official control (individually or a combination thereof), provided for in article 14 of Regulation (EU) 2017/625, whether

¹ The scores are from part 1 of the food hygiene scoring system, set out in annex 1 of the Code.

Food hygiene intervention rating	Current approach	Proposed approach
and method of handling ¹⁾		undertaken physically or remotely; and <ul style="list-style-type: none"> • a non-official control, which can be undertaken physically or remotely
E	Alternative Enforcement Strategy (AES), which must ensure establishments continue to be subject to official controls	Alternate between: <ul style="list-style-type: none"> • any method and technique of official control (individually or a combination thereof), provided for in article 14 of Regulation (EU) 2017/625, whether undertaken physically or remotely; and • a non-official control, which can be undertaken physically or remotely

To support CAs in determining the methods and techniques to use, including whether to undertake them remotely, it is proposed that, as well as ensuring that the methods and techniques can verify compliance and identify non-compliances, they also consider the following factors:

- the purpose of the official control
- which methods and techniques would be most effective and appropriate, in the circumstances, this would take into account whether the CA will subsequently be issuing a revised FHRS rating
- the methods and techniques used previously, including whether undertaken physically or remotely
- whether officers are familiar with the establishment
- the track record of the establishment and any data, information or intelligence received about the establishment since the last official control
- whether the FBO is capable of receiving an official control remotely
- whether the technology used during an official control ensures confidentiality and security of business data

Revision of food hygiene intervention rating

It is proposed that, in certain circumstances, an establishments food hygiene intervention rating can be amended following a wider range of methods and techniques of official control, including those undertaken remotely.

It is proposed that, the intervention risk rating can be revised at the conclusion of an official control where effective and appropriate methods and techniques have been used, at establishments which are excluded or exempt from FHRS.

For establishments within scope of FHRS, it is proposed that, as currently, a food hygiene intervention rating can only be revised at the conclusion of a physical inspection or audit (full or partial).

Where there is flexibility to use other methods and techniques at establishments within scope of FHRS, these flexibilities can be used. However, as currently, a new intervention rating cannot be issued. but CAs would be able to amend the date that the next intervention is due.

Rationale for change

As part of the modernised FHDM consultation flexibility as to what methods and techniques for official controls could be used by CAs was proposed.

Respondents generally considered the proposed increase in flexibility to be useful and acknowledged the benefits including potential efficiencies. However, some concerns and limitations were outlined including potential inconsistency in the application of the flexibilities. Also, with regard to the use of remote official controls, there was concern around risk rating some food businesses, especially those receiving an FHRS rating.

Taking into account the feedback, the proposed approach has been refined to address some of the concerns raised. The proposed approach retains the existing flexibilities but clarifies where remote methods and techniques may be used. The proposed approach will also enable, in certain circumstances, the food hygiene intervention rating to be amended following a wider range of methods and techniques of official control, which aligns with the food standards delivery model approach. However, to safeguard the FHRS, this would not apply to those establishments in scope of the scheme.

The proposed approach would enable CAs to use their resources effectively by focusing physical inspections and audits on the highest risk establishments, while providing the flexibility at lower risk establishments for CAs to use other methods and techniques of official controls. This would include those undertaken remotely, and, where appropriate, to amend the risk rating of an establishment where these flexibilities have been used.

Proposal 3: Extending the activities that officers, who do not hold a 'suitable qualification' for food hygiene or food standards, can, if competent, undertake

Current approach

The current Code provides that officers holding a 'suitable qualification' for food hygiene or food standards can, if competent, be authorised to undertake official food hygiene and/or standards controls, and other activities at all food businesses, including relevant enforcement action.

It also provides that officers who do not hold a 'suitable qualification' for food hygiene or food standards can, if competent, be authorised to undertake the following activities:

- alternative interventions at lower risk establishments (category D and E establishments for food hygiene)
- education, advice, and coaching
- information gathering (excluding gathering, processing, and sharing intelligence)
- assist, as appropriate, authorised officers (official fish inspectors) at Border Control Posts (BCPs)

Proposed approach

We propose extending the activities that officers who do not hold a 'suitable qualification' (currently referred to as 'suitable qualifications') can, if competent, be authorised to undertake. This would mean that in addition to the activities listed above, officers not holding a 'suitable qualification' could, if competent, be authorised to undertake:

- sampling
- non-official controls, including:
 - the initial desktop assessment of new food business establishments
 - gathering, processing, and sharing intelligence
- due official food hygiene controls at broadly compliant category D risk rated establishments and category E risk rated establishments which are:
 - not subject to approval under Regulation (EC) No 853/2004 or the requirements of Regulation (EU) No 210/2013 on the approval of establishments producing sprouts
 - rated 10 or less for 'type of food and method of handling'
 - rated 0 for 'method of processing'
- initial official food hygiene controls at establishments which:
 - from the initial desktop assessment are not subject to initial official controls within 28 days, meaning those with a potential hazard score of 30 - 97

- are not subject to approval under Regulation (EC) No 853/2004 or the requirements of Regulation (EU) No 210/2013 on the approval of establishments producing sprouts
- due official food standards controls at establishments which have an inherent risk score of at least 4 and a compliance assessment score of at least 3
- initial official food standards controls at establishments which from the initial desktop assessment, are anticipated to have an inherent risk score of 5

It is also proposed that, if when undertaking official controls it is found the risk rating category (food hygiene), inherent risk (food standards) and/or level of compliance has changed, so that the establishment does not meet the criteria above in relation to initial and due official controls, then the official control would be undertaken as soon as practicable by an officer holding a suitable qualification who is competent to carry out official controls at that type of establishment.

Additionally, if formal enforcement action is required, this would also be undertaken by an officer holding a suitable qualification and who is competent to undertake the formal enforcement action. However, if competent, officers not holding a suitable qualification could undertake informal action following official controls they have undertaken.

As currently, officers not holding a suitable qualification would be subject to appropriate supervision. For example, the outcome of the official controls they undertake, and the risk rating provided, is reviewed by an officer, who holds a suitable qualification and is competent, to ensure the risk rating is appropriate.

Rationale for change

Officers not holding a 'suitable qualification' are limited in the types of activities they can be authorised to undertake. One of the proposed developments consulted on as part of the modernised FHDM was to extend the activities officers not holding a 'suitable qualification' could, if competent, undertake, which included official controls at low-risk establishments. Feedback to this proposed development highlighted some concerns, however, in general additional flexibility as to who can undertake official controls was welcomed.

Recognising the feedback received, the proposed approach would extend the activities officers not holding a suitable qualification could, if competent, undertake, which would include official controls at low-risk establishments which do not use higher risk processes.

The proposed approach would allow CAs to deploy a wider cohort of officers and enable more effective use of resources. For example, CAs could authorise trainees, if competent, to undertake official control at low-risk establishments.

Based on data provided by CAs in England, Wales and Northern Ireland, to the FSA for the year 2023-2024, there were 305 officers (4 in NI) in relation to food hygiene and 209² officers (3 in NI) in relation to food standards, employed by CAs who did not hold a suitable qualification. This includes regulatory support officers and trainees working towards a suitable qualification. These officers, if competent, and assuming they have capacity, could be authorised to undertake official controls and the other activities listed above. Considering the Northern Ireland data, if all these officers were to be authorised, then it would mean an additional 4% of officers in relation to hygiene and 3% in relation to standards that could undertake official controls at lower risk establishments when compared to the number of officers holding a suitable qualification.

It is recognised that CAs may not have officers to authorise, and if they do, they may not have capacity to undertake additional activities. However, this proposal will provide CAs with additional flexibility to determine how to utilise officers who do not hold a suitable qualification and enable them to choose whether to extend the authorisations of officers who are competent.

To support CAs in determining whether officers are competent, the FSA provides a Competency Framework³ against which competency can be assessed. This means public health is not undermined by this proposal, as officers would still need to be able to demonstrate they are competent before being authorised to undertake any additional activities.

Proposal 4: Clarification in approach to interventions at food business establishments that fall into risk category E for food hygiene

Current approach

The current Code provides that the lowest risk establishments for food hygiene (those with an intervention rating of E) must, as a minimum, be subject to an intervention by a CA, which could be in the form of an AES, every three years. The Code also makes clear that CAs must ensure that where AES is used that establishments continue to be subject to official controls, and that their strategy must devise how official controls will be conducted at these establishments.

AES is defined in the Code as, ‘methods by which low risk establishments are monitored to ensure their continued compliance with food law.’ Examples of AES provided in the PG include making use of questionnaires, surveys, project-based inspections and

² This figure includes Trading Standards professionals in England and Wales.

³ The Competency Framework is currently being reviewed and it is anticipated that it will be relaunched in the summer.

intelligence gathering visits. Where CAs choose to use AES, the Code provides that they must set out their AES in their service plan or enforcement policy.

The PG advises that where AES is being used by CAs, that establishments are to have received an initial inspection and be risk rated before determining that AES is appropriate at that establishment. The PG also advises that, a CAs strategy allow interventions to be undertaken at establishments subject to AES, for example, where a consumer complaint has been received, and that a random percentage of establishments are subject to inspection.

The flexibility to use AES does not prevent CAs from using other methods and techniques, such as inspections or audits at these establishments, if that is the CAs preferred option. Additionally, AES cannot be used at establishments subject to approval under Regulation (EC) No 853/2004, as these establishments must receive an official control.

AES can also be used for food standards, with the Code providing that for the lowest risk establishments, any method and technique of official control could be used, as long as effective and appropriate in the circumstances, which could include remote interventions, or AES.

Proposed approach

It is proposed that, as currently, the lowest risk establishments for food hygiene (those with an intervention rating of E) receive an intervention every three years, but the frequency at which official controls are undertaken is clarified.

This would mean that establishments would continue to receive an intervention every three years, but this intervention would alternate between an official control and a non-official control.

The official control could, as currently, be any method and technique, and may be undertaken physically or remotely, provided it is effective and appropriate in the circumstances and verifies compliance with relevant food law.

The non-official control could be any activity which maintains contact with an establishment but does not verify compliance with relevant food law. This could also be undertaken physically or remotely.

This approach would mean that the term AES is removed from the Code and PG.

In relation to food standards, it is proposed that reference to AES is removed, but as currently, CAs would still be able to use any method and technique of official control at the lowest risk establishments, including those undertaken remotely.

Rationale for change

The current approach to interventions at category E establishments, with the flexibility to use AES, has caused some confusion in how interventions are being undertaken by CAs. It has also led to inconsistencies in the frequencies at which category E establishments receive official controls.

Article 9 of Regulation (EU) 2017/625, and the Code, provides that CAs shall perform official controls on all operators regularly, on a risk basis and with appropriate frequency.

To provide clarity and consistency in the frequency at which category E establishments receive official controls, and the methods and techniques that are appropriate, it is proposed that CAs would alternate between official controls and non-official controls every three years.

The proposed approach would, as currently, provide CAs with the flexibility to choose any method and technique of official control, including those undertaken remotely, and clarifies that an establishment is subject to an official control at least every 6 years. The proposed approach would also mean that CAs are no longer required to have an AES set out in their service plan or enforcement policy.

Currently, the Code provides that official controls at higher risk and/or non-compliant businesses, or those that are likely to be high-risk, take priority over official controls at those which are lower risk and/or compliant. Therefore, as currently, CA resources will continue to be focused towards the highest risk and/or non-compliant establishments.

The proposed approach is not anticipated to impact FHRS. As currently, a new (or updated) food hygiene intervention risk rating, and FHRS rating, would only be provided following a physical inspection or audit. If other methods and techniques of official controls or non-official controls are used, the FHRS rating would not be updated. This is consistent with the current approach where an FHRS rating is not updated following AES.

Proposal 5: Removal of the specific number of hours required for continuing professional development (CPD)

Current approach

The current Code provides that CAs must ensure officers undertaking official controls receive a minimum of 20 hours CPD a year, relevant to the activities they are authorised to undertake. These 20 hours are then split between 10 hours relating to subject matters set out in Chapter 1 of Annex II of [Regulation \(EU\) 2017/625](#), and 10 hours on other professional matters which supports an officer's role but is not necessarily food related.

Although currently the number of hours of CPD to undertake a year is 20, this is a minimum number, and it is recognised that some officers may need to undertake extra

hours depending on the experience of individual officers, their areas of authorisation and any specific training needs they may have.

Additionally, officers not holding a suitable qualification, such as regulatory support officers, do not have to undertake a minimum number of CPD hours, but are still required to receive relevant training that is appropriate to the activities they undertake.

Proposed approach

It is proposed that officers, including those that do not hold a suitable qualification, undertake CPD and training which is relevant to their role and the activities they are authorised to undertake. However, a minimum number of CPD hours is not specified. Instead, it is proposed that the amount of training and CPD officers receive is:

- proportionate to their role and the activities they are authorised to undertake
- informed by the officer's competency assessment
- reviewed and updated on an annual basis

It would be expected that CAs are able to demonstrate how they have assessed the CPD requirements of each officer, including the CPD and training that has been made available in response to the officer's learning and development needs.

Rationale for change

The current approach to CPD, and prescribing a minimum number of hours, does not recognise that every officer differs, and that to maintain or improve their competency, some officers may need more training and CPD than others. For example, the training and CPD needs of an officer undertaking official controls at lower risk establishments is likely to differ from an officer undertaking official controls at high-risk establishments.

We also have anecdotal evidence that the current approach has led to officers attending training courses solely to achieve the 20 hours CPD, even though the training may not be relevant to their role or needed to maintain their competence.

The proposed approach provides flexibility for CAs to determine the amount and type of training and CPD that each officer requires to be competent to undertake their role and the activities they are authorised for. This approach means that CAs can consider officers on an individual basis to ensure they receive the training and CPD they require.

It is recognised that, as currently, the proposed approach may mean that some officers undertake more than 20 hours training and CPD a year, but there may also be instances where officers receive less depending on their role, the activities they are authorised to undertake, and their competency.

Proposal 6: Other amendments to reflect legislative change, provide clarity, improve consistency and keep pace with current practices

There have been some other proposed changes to the Code and PG as detailed in Annexes A and B of this consultation package. Examples include:

- providing, in the PG, examples of where the additional score of 22 for vulnerable risk groups as set out in the food hygiene intervention rating scheme would not apply, to increase consistency in the use of this score
- providing more explicit reference and descriptors, regarding food safety culture, in part 3 of the food hygiene intervention rating scheme. Guidance has also been included in the draft PG. The purpose is to provide clarification and consistency in the assessment of food safety culture under confidence in management scoring, which reflects the legal obligations for FBOs to establish, maintain and provide evidence of an appropriate food safety culture in accordance with annex II of Regulation (EC) No 852/2004
- clarifying in the PG, where allergen cross-contamination is considered within the food hygiene intervention rating scheme, to increase consistency in how this is taken into account when risk rating establishments
- moving guidance on parts two and three of the food hygiene intervention rating scheme from the FHRS Statutory Guidance to the PG
- adding the [Trading Standards Professional Apprenticeship](#), depending on the modules completed, as a suitable qualification for food standards

This qualification was [endorsed](#) by the FSA in May 2023 and will widen the cohort of professionals that can undertake official food standards controls.

- adding the following qualifications to the list of suitable qualifications for food hygiene and 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
- amending terminology in the Code and PG so that it is consistent throughout. This includes consistent use of 'must' to highlight a legal obligation which CAs must follow, and 'should' to highlight statutory guidance that provides clarification and guidance on legal obligations, which CAs must have due regard to
- moving some provisions from the Code to the PG and vice versa to align with the terminology changes
- removing references to the Competency Framework from the Code, but retaining references to it in the PG. This is to enable the Competency Framework, following appropriate engagement/consultation with stakeholders, to be updated in a more agile manner
- clarifying in the Code the guidance on appropriate competency assessments

- removing references to the PG from the Code to enable the PG, following appropriate engagement/consultation with stakeholders, to be updated in a more agile manner
- removing references to the [Framework Agreement](#), as the relevant provisions from the Framework Agreement were already included within the Code and PG. It is anticipated that the Framework Agreement would be disapplied for food and feed controls in the future, when the Feed Code in England and Wales has been reviewed.
- Removing the section on ‘departure from the Code’, as although CAs must have regard to the Code, it does not prevent them from taking an alternative approach, as long as they meet their legal obligations. Taking this into account, this section was considered unnecessary
- removing references to simple cautions to take into account the [Police, Crime, Sentencing and Courts Act 2022](#) which removes use of term ‘simple caution’ and does not appear to include CAs as authorities who can serve diversionary or community cautions

Annexes A and B of this consultation package provide an overview of the changes and provides details of the provisions that have moved from the Code to the PG and vice versa.

Impacts

Costs

Costs to district councils

The economic costs that arise from the changes to the Code are described below.

Familiarisation costs

CA officers who deliver food hygiene and food standards official controls will have to familiarise themselves with the policy changes to the Code, and PG and any amendments to provide clarity and consistency which have been detailed in Annexes A and B of this consultation package.

In line with our standard methodology on the appraisal of new guidance, we have estimated the one-off familiarisation time by dividing the total word count of the amended sections of the Code and PG, where amendments to the FHDM and other policy changes have been made, along with the text in the summary of changes table at Annex A and B of this consultation pack (in total 17,124 words), by the average number of words a person can read per minute. For the amended sections of the Code and PG where there are policy changes, an average reading rate for technical text of 75 words per minute has been used. While for Annexes A and B we used an average reading rate for prose text of 275 words per minute. This generates a total familiarisation time of 1.77 hours.

In Northern Ireland, there are 11 CAs, and 203 qualified officers engaged in delivering food hygiene and standards controls⁴.

We anticipate that one lead food officer from each CA will read and familiarise themselves with the new changes (1.77 hours). It is also assumed that these officers would spend two hours to prepare and disseminate the information to other officers, via the appropriate channels.

It is then also assumed that all other food hygiene and standards officers would spend one hour reading the relevant changes. Additionally, they would receive one hour of cascade training to familiarise themselves with the changes.

One caveat is that there may have been some double counting between the number of officers undertaking food hygiene and the number of officers undertaking food standards official controls. This would potentially result in an overestimation of the familiarisation cost.⁵

Familiarisation costs are quantified by multiplying the wage cost of the relevant officers, with the time spent on familiarisation. For lead food officers we assume that their salary would be higher than for other authorised officers, for whom the wages of Health Services and Public Health Managers have been used. According to the Annual Survey of Hours and Earnings 2023 data, the median hourly wage cost is £32.40 for a manager and £26.67 for a food officer (including a 22% uplift for overheads⁶).

Multiplying the time spent on familiarisation, the number of officers in Northern Ireland and their respective wages generates a total cost of familiarisation of £11,586.

Local authority officer training costs

We anticipate that one lead food officer per CA would attend remote training to understand the proposed changes and to ensure consistent implementation. Therefore, we assume that 11 lead officers will spend approximately 1.25 hours each attending the training.

This training will be provided by the FSA remotely after the publication of the Code. The training will be recorded and become available to all other officers as part of their continuing professional development plan.

⁴ Data based on End of Year Survey 2023/24 received by CAs

⁵ The FSA Local Authority Monitoring Team has completed data accuracy checks, and any additional corrections will be updated in the analysis.

⁶ Uplift based on Regulatory Policy Committee [guidance](#)

Training costs are quantified by multiplying the number of officers undertaking the training with their relevant wage cost (£32.40) and the time spent on training. This generates a total training cost of £446.

Updating procedures costs

As the proposals introduce changes to how CAs manage and deliver interventions, we expect that CAs will need to update their procedures and paperwork to reflect the proposed approach to initial official controls. The cost associated with this will also depend on the number of CAs that choose to utilise the flexibilities described in the proposals. However, we don't have evidence to indicate how many CAs will adopt these flexibilities and how long it might take to update procedures.

Costs to industry

Impact of proposal to amend timescales for undertaking initial official controls

The proposed risk-based approach in relation to the prioritisation and timescales for undertaking initial official controls may mean that lower-risk establishments do not receive an initial FHRS rating for up to 3 months and 28 days, compared to 28 days currently. Although this would not legally prevent these establishments from trading, it could impact their ability to trade on at some marketplaces and online platforms. The reason for this is that the policies of these marketplaces and online platforms may require establishments to have an FHRS rating before allowing them to trade at their market or on their platform. However, based on analysis of FHRS data between April 2023 and March 2024, the average waiting time for an initial FHRS rating across Northern Ireland was just under 2 months. We have also provided advice in the PG that, CAs may consider undertaking an initial official control as a priority where the business is unable to trade until the official control has been undertaken.

Impact of proposal for approach to low-risk establishments

The proposed approach to low risk establishments is not anticipated to have an impact on businesses.

The proposed approach would mean that the lowest risk establishments would receive an intervention every three years, which alternates between an official control and a non-official control.

The current approach also means that these low-risk establishments receive an intervention every three years, and although currently, this intervention can be AES, these establishments are still required to be subject to official controls.

Similarly, the flexibility to decide what methods and techniques of official controls to use is not anticipated to have a significant impact on businesses. CAs already have flexibility to determine the type of intervention to undertake at low-risk establishments and this will

continue to be limited when the CA is required to provide a food hygiene rating to those establishments within scope of the FHRs scheme.

Benefits

Benefits to district councils

Enables the most effective use of resources

The majority of the key proposals enable CAs to make the most effective use of their resources.

The proposal to introduce a risk-based approach to the prioritisation and timescales for undertaking initial official controls will enable CAs to use their resources effectively while ensuring that establishments are subject to official controls within appropriate timescales. Additionally, officers not holding a 'suitable qualification' for food hygiene and/or food standards, but who are competent, could undertake the initial desktop assessment of new food business establishments.

Similarly, the proposal to extend the activities that officers not holding a 'suitable qualification' for food hygiene and/or food standards can, if competent, undertake will allow CAs to deploy a wider cohort of officers, which the current Code restricts. This could potentially further enable the effective use of CA resources.

As detailed above, based on data provided by CAs in England, Wales and Northern Ireland, to the FSA for the year 2023-2024, there were 305 officers (4 in NI) in relation to food hygiene and 209 officers (3 in NI) in relation to food standards, employed by CAs who did not hold a suitable qualification. If CAs choose to use the flexibility, these officers could, if competent, be authorised to undertake a wider range of activities, including official controls at lower risk establishments.

The proposed flexibility to undertake certain official food hygiene controls remotely, where appropriate, could also help officers save time and travel costs, leading to more effective use of CA resources, as they won't need to travel to the business premises to undertake the official control. Due to less travelling, we also anticipate an environmental benefit due to a reduction in carbon dioxide emissions. However, we cannot quantify this benefit, as we don't know to what degree individual CAs will avail of these flexibilities. Officers may also continue to carry out onsite official controls due to the overlapping nature of other CA functions that they have responsibility for which necessitate an onsite visit.

Additionally, the inclusion of additional suitable qualifications for food hygiene and food standards would enable CAs to recruit, and authorise, officers from a wider cohort of individuals.

Lastly, the proposed approach to training and CPD will provide CAs with the flexibility to determine the number of hours of training and CPD that each officer needs to undertake. This provides more flexibility for officers to engage in relevant and meaningful CPD tailored to their competency needs as opposed to meeting a prescriptive number of hours.

Benefits to consumers

Improve the quality and consistency of food control activities

The proposals are anticipated to improve the quality and consistency of food control activities and ensure CA resources are being used effectively, as well as prioritising resources on the highest risk establishments. This means that consumers will benefit from enhanced consumer protection through more efficient allocation of resources.

Engagement and consultation process

Widespread engagement activities have taken place throughout the development of these proposals.

Work to modernise the FHDM in Northern Ireland, England and, Wales commenced in September 2021. We established an LA/FSA Working Group to provide a mechanism for working collaboratively across the three countries to modernise the model. The Group helped to critically review and inform our thinking on the proposed developments.

The engagement with the LA/FSA Working group was supplemented by nine LA engagement events across the three nations and an online webinar during 2023. We also attended some industry group meetings. In parallel, we held a 12-week written consultation on the proposed developments, covering [Northern Ireland](#), [England](#) and [Wales](#).

As a result of that engagement and consultation, we have refined and further developed the proposals, which are the subject of this consultation.

At the end of this consultation period, the FSA will analyse the responses and make any relevant amendments to the Code. Within three months of the consultation ending, we aim to publish a summary of the responses received and provide a link to it on our website.

Questions asked in this consultation

To enable us to fully understand your responses and adequately take account of them, please explain, and where possible evidence, any answers to the questions we have included in this consultation. Please complete the consultation response form (see Responses section below).

Questions in relation to proposals 1 to 6

1. In relation to proposal 1, an updated risk-based approach to the prioritisation and timescales for undertaking initial official controls of new food establishments:
 - a. 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 require further consideration, and why).
 - b. 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.
 - c. 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.
2. 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:
 - a. 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).
 - b. 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?
3. 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:

- a. 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).
 - b. 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?
4. In relation to proposal 4, a clarification in approach to interventions at food business establishments that fall into risk category E for food hygiene, 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).
5. In relation to proposal 5, removal of the prescriptive number of hours required for continuing professional development, 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).
6. In relation to proposal 6 - other amendments to reflect legislative change, provide clarity, improve consistency and keep pace with current practices:
 - a. 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)
 - b. 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)
 - c. 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)
 - d. 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 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)

e. do you have any objections to the inclusion of the following qualifications within the Code:

- Trading Standards Professional Apprenticeship with the food module as a suitable 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 do have any objections, please provide reasons for these. (Please specify any aspects of the proposal which require further consideration, and why)

f. 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)

g. 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)

h. 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)

Additional comments and suggestions

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

Questions in relation to impacts

8. In relation to impacts:

a. 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.

- b. 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.
- c. 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.
- d. 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).

Potential future developments

The Official Control Regulations requires CAs to have access to a sufficient number of suitably qualified and experienced officers. The 'suitable qualification' requirement is currently referenced in the Code as statutory guidance and the list of FSA endorsed qualifications in the Code provide examples of the qualifications we currently consider equate to "suitably qualified".

To inform future policy development we are seeking early stakeholder views on potential options regarding how we manage and where we publish the list of FSA endorsed qualifications.

One of the options that we are seeking views on would transfer the list of qualifications from the Code to the PG. There would be published governance procedures for how this process would be managed. More detail on this option is outlined in [Annex C](#).

We are seeking to understand stakeholders' views on perceived advantages, disadvantages and impacts of this option and whether any other options should be considered.

Questions in relation to future potential developments

- I. 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.
- II. What do you perceive to be the advantages, disadvantages and impacts if we move the list of qualifications from the Code to the PG?
- III. Is there an alternative way that we could more expediently update the list of FSA endorsed qualifications from the one presented?

Other relevant documents

- [Draft Food Law Code of Practice \(Northern Ireland\)](#)
- [Draft Food Law Practice Guidance \(Northern Ireland\)](#)

Responses

Responses 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).

Please use the consultation response form to provide your comments.

[Consultation response form](#)

To enable us to fully understand your responses and adequately take account of them, please explain, and where possible evidence, any answers to support your feedback.

The consultation response form should then be emailed

CodeReviewResponses@food.gov.uk.

For information on how the FSA handles your personal data, please refer to the [privacy notice for consultations](#) on the FSA website.

Further information

If you require a more accessible format of this document, please contact us by emailing CodeReviewResponses@food.gov.uk and your request will be considered.

This consultation has been prepared in accordance with [HM Government consultation principles](#).

Thank you on behalf of the Food Standards Agency for participating in this public consultation.

Yours faithfully,

Louise Connolly
Local Authority Policy and Delivery Lead

Annex A: Summary of changes to the Food Law Code of Practice

Reference	Current Code	Draft Code	Record of change to the Code
COP 1	Chapter 1	Chapter 1	Terminology amended and updated with regard to the Windsor Framework and Northern Ireland Retail Movement Scheme.
COP 2	Section 2.1	Section 2.1	Terminology amended.
COP 3	Section 2.2	Section 2.2	Provisions relating to having regard to the Code, and who the Code applies to removed, as duplicated guidance in chapter 1 of the draft Code. Provisions relating to datasets amended for clarity.
COP 4	Section 2.3	N/A	Provisions relating to departure from the Code removed, due to potential concerns around sub-delegation.
COP 5	Section 2.4	Section 2.3	Terminology amended. References to Framework Agreement and PG removed in line with proposal 6.
COP 6	Section 2.4.1	Section 2.3.1	Terminology amended. Provisions relating to documented procedures moved from section 2.4 of the current PG. References to Framework Agreement and other guidance removed in line with proposal 6.
COP 7	Section 2.4.2	Section 2.3.2	Terminology amended. Provisions relating to documented policies moved from section 2.5 of the current PG. References to Framework Agreement and other guidance removed in line with proposal 6.
COP 8	Section 2.4.3	Section 2.3.3	Terminology amended. Provisions relating to documented plans, programmes, and strategies moved from sections 2.6 and 2.7 of the current PG. References to Framework Agreement and other guidance removed in line with proposal 6.

Reference	Current Code	Draft Code	Record of change to the Code
COP 9	N/A	Section 2.4	Terminology amended. Provisions relating to delegation of official controls and other official activities moved from section 3.2.2.2 of the current Code.
COP 10	Section 2.5	N/A	Title amended and provisions relating to designation of CAs for food moved to section 2.4.4 of the draft PG.
COP 11	Section 2.6.1	Section 2.5 Section 2.5.1	Terminology amended. Provisions relating to liaison arrangements split into two sections. References to Framework Agreement and other legislation removed in line with proposal 6.
COP 12	Section 2.6.2	Section 2.5.2	Terminology amended. Provisions relating to responding to referrals removed as covered by other provisions in this section.
COP 13	Section 2.6.3	Section 2.5.4	Terminology amended. Provisions relating to regional and local liaison groups moved to section 2.4.5 of the draft PG.
COP 14	Section 2.6.4	Section 2.5.3	Terminology amended.
COP 15	Section 2.7.1 Section 2.7.2 Section 2.8	N/A	Provisions relating to Primary Authority, Home Authority and provision of discretionary services moved to sections 2.7.1, 2.7.2 and 2.8 of the draft PG.
COP 16	Section 2.9	Section 2.6.1	Terminology amended. Reference to Framework Agreement removed in line with proposal 6.
COP 17	Section 2.10	Section 2.6	Terminology amended.
COP 18	Section 2.11	Section 2.5.2.1	Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 19	Section 2.12.1	N/A	Provisions relating to registration and approval requirements moved to section 2.6.2 of draft Code.
COP 20	Section 2.12.2	Section 2.6.2	Terminology amended. Provisions relating to food establishment lists moved from section 2.14.1 of the current PG.
COP 21	N/A	Section 2.6.3	Provision relating to information to record about each food business establishment moved from section 2.14.3 of the current PG and terminology amended.
COP 22	Section 2.12.2.1	Section 2.6.4	Terminology amended. Provision relating to maintaining an up-to-date list of establishments moved to section 2.6.2 of the draft Code. Provision relating to data protection moved to section 2.5.1.1 of the draft PG.
COP 23	Section 2.12.2.2	Section 2.6.5	Terminology amended. Provision relating to maintaining an up-to-date list of approved establishments moved to section 2.6.2 of the draft Code.
COP 24	Section 2.13.1	Section 2.7.1	Terminology amended. Provisions relating to supplying relevant approval information and considering all activities for which approval is required moved to section 2.3.1 of the draft Code.
COP 25	Section 2.13.2	Section 2.7.2	Terminology amended.
COP 26	Section 2.13.3	Section 2.7.3	Terminology amended. Reference to the Framework Agreement removed in line with proposal 6.
COP 27	Section 2.13.4	N/A	Provisions relating to refusal of approval moved to section 2.7.3 of the draft Code.
COP 28	Section 2.13.5	N/A	Provisions relating to change of activities and ownership removed as duplicated details in approval guidance.

Reference	Current Code	Draft Code	Record of change to the Code
COP 29	Section 2.13.6	N/A	Provisions relating to establishments thought to be engaged in activities requiring approval moved to section 2.7.1 of the draft Code.
COP 30	Section 2.14	N/A	Provisions relating to timescales for retaining records moved to section 2.6.3 of the draft Code. Provisions relating to where longer retention of documents moved to section 2.5.2 of the draft PG.
COP 31	Section 3.1	Section 3.1	Amended to reflect content of chapter, and Competency Framework transition period removed.
COP 32	Section 3.2 Section 3.2.1 Section 3.2.2 Section 3.2.2.1	N/A	Provisions relating to delegation of official controls and other official activities moved to section 2.3.1 and 2.3.2 of the draft PG.
COP 33	Section 3.2.2.2	N/A	Provisions relating to delegation of certain tasks of the CAs moved to section 2.4 of the draft Code.
COP 34	Section 3.3	N/A	Section heading removed.
COP 35	Section 3.3.1	Section 3.2	Terminology amended. Provision relating to engaging experts moved to section 3.2.2 of the draft Code.
COP 36	Section 3.3.2	Section 3.2.2	Terminology amended. Provisions relating to authorisation being in writing moved to section 2.3.1 of the draft Code. Provisions relating to officer competency moved to section 3.2.4 of the draft Code.
COP 37	Section 3.3.3	N/A	Provisions relating to authorised officers removed due to proposal 3, which proposes to remove use of the term 'regulatory support officer'.

Reference	Current Code	Draft Code	Record of change to the Code
COP 38	Section 3.3.4	Section 3.2.1	Terminology amended. Provision relating to notifying FSA of lead officer details moved to section 3.2.1 of the draft PG.
COP 39	Section 3.3.5	N/A	Provisions relating to regulatory support officers removed due to proposal 3, which proposes to remove use of the term 'regulatory support officer'.
COP 40	Section 3.4	Section 3.2.3	Section heading amended. Provisions relating to the activities that officers not holding a suitable qualification can, if competent, be authorised to undertake moved to this section, from section 3.3.5 of current Code, and amended to reflect proposal 3.
COP 41	Section 3.4.1	Section 3.2.3.1	Terminology amended. Provisions relating to qualifications with restrictions moved to section 3.2.3.3 of draft Code. Footnote removed. Degree in Environmental Health awarded by Dublin Institute of Technology (awarded from June 2012 onwards) and Degree in Environmental Health awarded by Technological University Dublin included in the list of suitable qualifications for food hygiene.
COP 42	N/A	Section 3.2.3.3	Provisions relating to qualifications with restrictions moved from section 3.4.1 of current Code.
COP 43	Section 3.4.2	Section 3.2.3.2	Terminology amended. Provisions relating to restricted qualifications moved to section 3.2.3.3 of draft Code. Footnote removed. Provisions relating to quality assurance systems removed. The following included as a suitable qualification for food standards: <ul style="list-style-type: none"> • Trading Standards Professional apprenticeship, with the food standards module • Degree in Environmental Health awarded by Dublin Institute of Technology (awarded from June 2012 onwards)

Reference	Current Code	Draft Code	Record of change to the Code
			<ul style="list-style-type: none"> Degree in Environmental Health awarded by Technological University Dublin
COP 44	Section 3.4.3	Section 3.2.3.4	Terminology amended. Guidance on relevant professional awarding bodies moved to section 3.2.3.3 of the draft PG.
COP 45	N/A	Section 3.2.3.5	New section added relating to notification of new qualifications.
COP 46	Section 3.5	Section 3.4	Section heading and terminology amended.
COP 47	Section 3.5.1	Section 3.4.1	Terminology amended.
COP 48	Section 3.5.2	Section 3.4.2	Terminology amended.
COP 49	Section 3.6	Section 3.2.4	Terminology and section heading amended. Provisions relating to competency assessment moved from section 3.3.2 of current Code and provisions relating to definition of competency is moved from section 3.4 of the current PG. Reference to Competency Framework moved to section 3.2.4 of draft PG.
COP 50	N/A	Section 3.2.4.1	New section added. Provisions relating to competency assessment moved from section 3.4.6 of the current PG.
COP 51	Section 3.7	N/A	Section heading removed.
COP 52	Section 3.7.1	Section 3.3	Terminology amended. Provisions relating to officers receiving appropriate training moved to section 3.2 of draft Code, while other provisions relating to records moved to section 3.2.2 of the draft Code. Amendments to provisions relating to CPD as detailed in proposal 5.
COP 53	Section 3.7.2	N/A	Terminology amended and included in section 3.3 of the draft Code.
COP 54	Section 4.1	Section 4.1	Terminology amended. Footnote removed.

Reference	Current Code	Draft Code	Record of change to the Code
COP 55	Section 4.2	Section 4.4	Terminology amended. Provisions relating to frequency of controls moved to section 4.2 of the draft Code, other provisions relating to performing official controls moved from section 4.2.2 of current Code. Some provisions relating to businesses being aware of purpose of official control moved from section 4.2.2 of the current PG.
COP 56	Section 4.2.1	N/A	Provisions relating to prior notification incorporated into section 4.4 of draft Code.
COP 57	Section 4.2.2	N/A	Provisions relating to carrying out official controls moved to section 4.4 of the draft Code and terminology amended. Provision relating to recording sufficient information about findings moved to section 4.6 of the draft Code. Provisions relating to Primary Authority removed, as included in section 2.7.1 of the draft PG.
COP 58	Section 4.2.3	Section 4.6	Terminology and section heading amended. Provisions relating to records and what should be included in the records moved from section 4.3.4 of the current PG.
COP 59	Section 4.2.4	Section 4.2.3	Terminology and section heading amended. Clarification of establishments not covered by this section added.
COP 60	N/A	Section 4.2.3.1	New section added relating to initial desktop assessment. Provisions relating to desktop assessment moved from section 4.2.4.2 of the current Code.
COP 61	Section 4.2.4.1	Section 4.2.3.2	Terminology amended. Approach to initial official controls amended to reflect proposed policy changes detailed in proposal 1.
COP 62	Section 4.2.4.2	Section 4.2.3.3	Terminology amended. Provisions relating to desktop assessment moved to section 4.2.3.1 of draft Code. Examples of prioritisation moved to section 4.2.3.2 of the draft PG.

Reference	Current Code	Draft Code	Record of change to the Code
COP 63	N/A	Section 4.2	Provisions relating to frequency of official controls moved from section 4.2 of the current Code. Terminology amended.
COP 64	Section 4.3	N/A	Section heading removed.
COP 65	Section 4.3.1	Section 4.2.4	Terminology amended. Provisions relating to information or intelligence suggesting the nature of a business's activities has changed moved from sections 4.3.2 of current Code. Provisions relating to using full range of scores and consideration of information supplied by others moved to section 4.2.5 of the draft Code.
COP 66	Section 4.3.2	Section 4.2.5	Provisions relating to consideration of information supplied by others moved from section 4.3.1. Provisions relating to revision of intervention ratings moved from sections 4.3.2.1 and 4.3.2.2 of current Code and amended to reflect the proposed flexibilities as to methods and techniques that can be used, detailed in proposal 2. Terminology amended.
COP 67	Section 4.3.2.1	N/A	Provisions relating to revision of intervention ratings moved to section 4.2.5 of the draft Code.
COP 68	Section 4.3.2.2	N/A	Provisions relating to revision of intervention ratings moved to section 4.2.5 of the draft Code.
COP 69	Section 4.3.3	N/A	Provisions relating to alternative enforcement strategy removed as a result of proposed policy changes to the approach to category E establishments – proposal 4.
COP 70	N/A	Section 4.3	New section providing details relating to proposed flexibilities as to methods and techniques of official controls, taking into account proposal 2.

Reference	Current Code	Draft Code	Record of change to the Code
COP 71	Section 4.4.1	Section 4.3.1	Terminology amended. Provisions relating to methods and techniques moved from sections 4.4.1.1, 4.4.1.2, 4.4.1.3 and 4.4.1.4 of current Code. Provisions relating to category E establishments amended to take into account proposal 4.
COP 72	Section 4.4.1.1 Section 4.4.1.2 Section 4.4.1.3 Section 4.4.1.4	N/A	Provisions relating to methods and techniques of official control moved to section 4.3.1 of the draft Code.
COP 73	Section 4.4.2	Section 4.3.2	Terminology amended. Provisions relating to methods and techniques of official controls moved from sections 4.4.2.1 and 4.4.2.2 of the current Code.
COP 74	Section 4.4.2.1 Section 4.4.2.2	N/A	Provisions relating to methods and techniques of official control moved to section 4.3.2 of the draft Code.
COP 75	Section 4.5	N/A	Provisions relating to sampling moved to section 4.3.3 of the draft PG.
COP 76	N/A	Section 4.3.3 Section 4.3.3.1 Section 4.3.3.2 Section 4.3.3.3	Provisions related to sampling moved from section 4.6 and relevant sub-sections of the current PG.
COP 77	N/A	Section 4.4.1 Section 4.4.1.1 Section 4.4.1.2 Section 4.4.1.3	Provisions relating to official controls undertaken on ships and aircraft moved from section 4.7 and relevant sub-sections of the current PG.

Reference	Current Code	Draft Code	Record of change to the Code
COP 78	N/A	Section 4.5	Provisions relating to non-official controls moved from section 4.2.7 of the current PG.
COP 79	Section 4.6.1	N/A	Provisions relating to nominated officer for imported food moved to section 4.7.1.4 of the draft PG.
COP 80	Section 4.6.2	N/A	Provisions relating to imported food controls forming part of official controls inland moved to section 4.4 of the draft Code.
COP 81	N/A	Section 4.7.1	Provisions relating to imported food procedures moved from section 4.5 of the current PG.
COP 82	Section 4.6.3	Section 4.7.2	No change.
COP 83	Section 4.6.3.1.	Section 4.7.2.1	Terminology amended. Provisions relating to consignments, records and facilities moved from section 4.5 of the current PG.
COP 84	Section 4.6.3.2	Section 4.7.2.2	Terminology amended. Provisions relating to risk based planned arrangements moved from section 4.5.9.2 of the current PG. Provisions relating to no permanent presence at a point of entry moved from section 4.6.5 of the current Code.
COP 85	Section 4.6.3.3	Section 4.7.2.3	No change.
COP 86	Section 4.6.4	Section 4.7.3	No change.
COP 87	Section 4.6.5	N/A	Provisions relating to no permanent presence at point of entry moved to section 4.7.2.2 of draft Code. Provisions relating to who to contact, moved to section 4.7.2.1 of the draft PG.

Reference	Current Code	Draft Code	Record of change to the Code
COP 88	N/A	Section 4.7.4	Provisions relating to liaison/referrals moved from section 4.7.4 of the current PG. Terminology amended.
COP 89	Section 5.1	Section 5.1	Terminology amended.
COP 90	Section 5.2	Section 5.2	No change.
COP 91	Section 5.2.1	Section 5.2.1	No change.
COP 92	Section 5.2.2	Section 5.2.2	No change.
COP 93	Section 5.3	Section 5.3	No change.
COP 94	Section 5.3.1	Section 5.3.1	No change.
COP 95	Section 5.3.2	Section 5.3.2	No change.
COP 96	Section 5.3.3	Section 5.3.3	No change.
COP 97	Section 5.3.3.1	Section 5.3.3	Sub-heading removed and duplicated wording removed.
COP 98	N/A	Section 5.3.4	Provisions relating to root cause analysis moved from 5.2.5 of current PG. Terminology amended.
COP 99	Section 5.3.4	Section 5.3.5	Terminology amended.
COP 100	Section 5.3.5	Section 5.3.6	Terminology amended.
COP 101	Section 5.3.6	Section 5.3.7	Terminology amended.
COP 102	Section 5.3.7	Section 5.3.8	Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 103	Section 5.4	Section 5.4	No change.
COP 104	Section 5.4.1	Section 5.4.1	Terminology amended.
COP 105	Section 5.4.2	Section 5.4.2	Terminology amended.
COP 106	Section 5.4.3	Section 5.4.3	Terminology amended.
COP 107	Section 5.4.4	Section 5.4.4	Terminology amended.
COP 108	Section 5.5	N/A	Section heading removed.
COP 109	Section 5.5.1	Section 5.5	No change.
COP 110	Section 5.6	Section 5.6	Terminology amended.
COP 111	Section 5.6.1	N/A	Provisions relating to notification of incidents regarding imported food removed as reference to the PG removed in line with proposal 6.
COP 112	Section 5.6.2	Section 5.6.1	Reference to the PG removed in line with proposal 6.
COP 113	Section 5.6.3	Section 5.6.2	Terminology amended.
COP 114	Section 5.6.4	N/A	Provisions relating to disclosure of information to countries outside the UK removed as reference to the PG removed in line with proposal 6.
COP 115	Section 5.6.5	Section 5.6.3	No change.
COP 116	Section 5.7	Section 5.7	Terminology amended.
COP 117	Section 6.1	Section 6.1	Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 118	Section 6.2	N/A	Provisions relating to enforcement action and consideration of enforcement policy moved to section 6.3.4 of draft Code. Provisions relating to Primary Authority Partnership and the Code for Prosecutors moved to section 6.3.3 of draft PG. Provision relating to considering nature of non-compliance and FBO past record moved to section 6.3.2 of the draft Code.
COP 119	N/A	Section 6.2	New section to provide information relating to powers of entry. Provisions relating to using powers within another Competent Authority area moved from section 6.6 of current Code. Terminology amended.
COP 120	Section 6.3	Section 6.3.4	Terminology amended. Examples of enforcement action moved to section 6.3.1 of draft PG. Provisions relating to a prioritising action moved to section 6.3.3 of the draft Code.
COP 121	Section 6.4	Section 6.3	Title amended.
COP 122	Section 6.4.1	Section 6.3.1	Terminology amended.
COP 123	Section 6.4.2	Section 6.3.2	Terminology amended and updated to include reference to enforcement action for non-compliance of goods produced to GB standards. Provisions relating to discussing advice with food business operators moved to section 6.3.3 of draft PG. Provision relating to resolution of non-compliances moved to section 6.3.4 of draft Code. Provisions relating to written notification of enforcement moved to section 6.3.5 of draft Code.
COP 124	N/A	Section 6.3.3	New section to provide information regarding prioritisation. Provisions relating to prioritising action moved from section 6.3 of current Code. Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 125	N/A	Section 6.3.5	New section to provide information regarding notification of enforcement action. Provisions relating to written notification moved from section 6.4.2 of current Code. Terminology amended.
COP 126	N/A	Section 6.4	New section to provide information regarding taking formal action and service of notices and avoidance of a dual hygiene regulatory system. Provisions relating to considerations when taking enforcement action and use of correct notices moved from section 6.6.2 of current PG. Terminology amended.
COP 127	Section 6.5	Section 6.4.1	Title amended. Terminology amended. Provisions relating to resolution of non-compliance moved to section 6.3.4 of draft Code. Provisions relating to timing of action moved to section 6.4.1.1 of draft Code.
COP 128	Section 6.5.1	Section 6.4.1.1	Terminology amended. Provisions relating to timing of action moved from section 6.5 of current Code.
COP 129	Section 6.5.2	N/A	Section heading removed as provisions relating to food standards revisits now included under section 6.4.1 header of draft Code.
COP 130	Section 6.5.2.1	Section 6.4.1.2	Title amended. Terminology amended.
COP 131	Section 6.5.2.2	Section 6.4.1.3	Title amended. Terminology amended.
COP 132	N/A	Section 6.4.2	New section to provide information relating to checks on compliance with formal enforcement action. Provisions relating to checking remedial work moved from section 6.6.14 and 6.6.15 of current PG. Terminology amended.
COP 133	Section 6.6	N/A	Provisions relating to operating in another Competent Authority's area removed as provisions moved to section 6.2 of draft Code.

Reference	Current Code	Draft Code	Record of change to the Code
COP 134	Section 7.1	Section 7.1	Terminology amended.
COP 135	N/A	Section 7.2	New section to provide information relating to registration of shellfish gatherers.
COP 136	Section 7.2	Section 7.3	Title amended. Terminology amended.
COP 137	Section 7.3	Section 7.4	Title amended.
COP 138	Section 7.3.1	Section 7.4.1	Title amended. Terminology amended.
COP 139	Section 7.3.2	Section 7.4.2	Title amended. Terminology amended.
COP 140	Section 7.3.3	Section 7.4.3	Terminology amended. Provisions relating to checking registration documents and contacting other Competent Authorities moved from section 7.3.1 of the current Code.
COP 141	Section 7.3.4	N/A	Provisions relating to approvals of purification centres removed as duplicated guidance available in other FSA approvals guidance.
COP 142	Section 7.3.5	N/A	Provisions relating to sampling as part of the inspection removed as duplicated details in other FSA sampling and live bivalve mollusc guidance.
COP 143	Section 7.4	N/A	Provisions relating to production and relaying areas moved to section 7.3.1 of the draft PG. Terminology amended.
COP 144	Section 7.4.1	N/A	Terminology amended and moved to section 7.3.1 of the draft PG.
COP 145	Section 7.4.2	Section 7.7	Terminology amended.
COP 146	Section 7.5	Section 7.5	Title amended. Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 147	N/A	Section 7.6	New section to provide information relating to live bivalve molluscs and other shellfish which fail to satisfy requirements. These provisions have been moved from section 7.1.14 of current PG. Terminology amended.
COP 148	Annex 1	Annex 1	Terminology amended. Additional descriptors included in part 3 of the food hygiene intervention rating scheme relating to food safety culture.
COP 149	Annex 2	N/A	Annex removed due to end of new food standards delivery model transition period.

Annex B: Summary of changes to the Food Law Practice Guidance

Reference	Current PG	Draft PG	Record of change to the PG
PG 1	Chapter 1	Chapter 1	Terminology amended and updated with regard to the Windsor Framework and Northern Ireland Retail Movement Scheme.
PG 2	Section 2.1	Section 2.1	Terminology amended and updated.
PG 3	Section 2.2	N/A	Provisions listing datasets removed.
PG 4	Section 2.3	N/A	Provisions relating to departure from the Code removed to align with removal of this provision in the draft Code.
PG 5	Section 2.4	Section 2.2	Section heading title amended.
PG 6	Section 2.4.1	Section 2.2.5	Terminology amended. Additional provisions included in relation to and recording date registration form received.
PG 7	Section 2.4.2	Section 2.2.1	Terminology amended. Provisions relating to approvals procedure moved to section 2.3.1 of the draft Code. Link to approvals guidance added.
PG 8	Section 2.4.3	N/A	Provisions relating to food business establishment database procedure moved to section 2.3.1 of the draft Code.
PG 9	Section 2.4.4	Section 2.2.2	Terminology amended. Provisions relating to maintaining a control verification procedure, steps to address performance and demonstrating consistent application moved to section 2.3.1. of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 10	Section 2.4.4.1	Section 2.2.2.1	Terminology amended. Provisions relating to quantitative and qualitative monitoring and records of monitoring moved to section 2.3.1 of the Code.
PG 11	Section 2.4.4.2	Section 2.2.2.2	Terminology amended.
PG 12	Section 2.4.4.3	Section 2.2.2.3	Terminology amended. Provision relating to addressing non-compliances in a timely and effective manner moved to section 2.3.1 of the draft Code.
PG 13	Section 2.4.4.4	Section 2.2.2.4	Terminology amended. Provisions relating to issues that may be identified through monitoring of management information systems removed as duplicated guidance in other sections of the PG.
PG 14	Section 2.4.5	N/A	Provisions relating to authorisation procedure moved to section 2.3.1 of the draft Code.
PG 15	Section 2.4.6	Section 2.2.6	Terminology amended. Provisions relating to food incidents and alerts procedure moved to section 2.3.1 of the draft Code.
PG 16	Section 2.4.7	Section 2.2.7	Terminology amended.
PG 17	Section 2.4.8	Section 2.2.8	Terminology amended. Provisions relating to what a food complaints procedure should cover, referral arrangements, receipt of complaints and their investigation moved to section 2.3.1 of the draft Code.
PG 18	Section 2.4.9	N/A	Provisions relating to sampling procedure moved to section 2.3.1 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 19	Section 2.4.10	Section 2.2.9	Terminology amended. Provisions relating to identification of equipment and measures taken for unsatisfactory in-service checks of equipment moved to section 2.3.1. of the draft Code.
PG 20	Section 2.4.11	Section 2.2.4	Terminology amended.
PG 21	Section 2.4.12	N/A	Provisions relating to official food controls procedure moved to section 2.3.1. of the draft Code.
PG 22	Section 2.4.13	Section 2.2.10	Terminology amended.
PG 23	Section 2.4.14	Section 2.2.3	Terminology amended.
PG 24	Section 2.4.15	Section 2.2.11	Terminology amended.
PG 25	N/A	Section 2.2.4	Provisions relating to identifying and rectifying inaccuracies in published information moved from section 2.4.4 of the current PG.
PG 26	Section 2.5	N/A	Section heading removed.
PG 27	Section 2.5.1	Section 2.2.13	Terminology amended. Provisions relating to setting out general approach to food sampling, including unsatisfactory samples within the sampling policy moved to section 2.3.1. of the draft Code.
PG 28	Section 2.5.2	Section 2.2.14	Terminology amended. Provisions relating to approval of enforcement policies moved to section 2.3.1. of the draft Code.
PG 29	Section 2.5.3	Section 2.2.15	Terminology amended. Provisions relating to approach to receiving complaints and what complaints policy covers moved to section 2.3.1. of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 30	Section 2.6	N/A	Section heading removed.
PG 31	Section 2.6.1	2.2.18	No change.
PG 32	Section 2.6.1.1	Section 2.2.18.1	Terminology amended.
PG 33	Section 2.6.1.2	Section 2.2.18.2	Terminology amended. Provisions relating to period service plan covers, and its approval moved to section 2.3.1. of the draft Code. Provisions relating to development of the service plan moved to section 2.2.18.3 of the draft PG.
PG 34	N/A	Section 2.2.18.3	Provisions relating to development of service plan moved from section 2.6.1.2 of the current PG. Terminology amended.
PG 35	2.6.1.3	Annex 1	Terminology amended.
PG 36	Section 2.6.2	Section 2.2.16	Terminology amended.
PG 37	Section 2.7	N/A	Section heading removed.
PG 38	Section 2.7.1	Section 2.2.19	Terminology amended. Provisions relating to departure from Code removed to align with approach taken in Code.
PG 39	Section 2.7.2	Section 2.2.20	Terminology amended. Provisions relating to what a sampling programme should consider moved to section 2.3.1. of the draft Code.
PG 40	Section 2.7.3	Section 2.2.17	Terminology amended. Additional point on training programmes being informed by officer competency assessments included.

Reference	Current PG	Draft PG	Record of change to the PG
PG 41	Section 2.7.4	NA	Provisions removed in line with proposal 4.
PG 42	NA	Section 2.3	Provision relating to delegation of official controls moved from section 3.2 of the current Code.
PG 43	NA	Section 2.3.1	Provisions relating to delegation to authorising officers moved from section 3.2.1 of the current Code. Terminology amended.
PG 44	NA	Section 2.4.2 Section 2.3.2	Provisions relating to delegation to other CAs moved from section 3.2.2 of the current Code. Terminology amended.
PG 45	Section 2.8	Section 2.4	No change.
PG 46	Section 2.8.1	Section 2.4.1	Terminology amended.
PG 47	N/A	Section 2.4.2	Provisions relating to liaison with FSA moved from section 2.6.2 of the current Code.
PG 48	Section 2.8.2	Section 2.4.3	Terminology amended.
PG 49	N/A	Section 2.4.4	Provisions relating to division of responsibilities moved from section 2.13.1 of the current PG.
PG 50	N/A	Section 2.4.5	Provisions relating to regional and local liaison groups moved from section 2.6.3 of the current Code.
PG 51	Section 2.9	Section 2.7	Section heading title amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 52	Section 2.9.1	Section 2.7.1	Terminology amended. Links to guidance provided. Provisions relating to the FSA being a supporting regulator moved from section 2.9.4 of the current PG.
PG 53	N/A	Section 2.7.2	Provisions relating to home authority moved from section 2.7.2 of the current Code. Terminology amended.
PG 54	Section 2.9.2	N/A	Provisions relating to inspection plans removed from PG as duplicated details in Primary Authority guidance provided by OPSS. Links to this guidance provided.
PG 55	Section 2.9.3	N/A	Provisions relating to compliance issues and enforcement actions where a business has a primary authority removed from PG as duplicated details in Primary Authority guidance provided by OPSS. Links to this guidance provided.
PG 56	Section 2.9.4	N/A	Provisions relating to the FSA being a supporting regulator moved to section 2.7.1 of the draft PG.
PG 57	Section 2.10	N/A	Provisions relating to facilities and equipment removed as duplicated guidance included in section 2.6 of the draft Code.
PG 58	Section 2.11	N/A	Provisions relating to enforcement e-mail addresses removed as duplicated section 2.5.2.1 of the draft Code.
PG 59	Section 2.12	Annex 2	Section heading title amended.
PG 60	Section 2.12.1	N/A	Provisions moved to the glossary in the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 61	Section 2.12.2	A2.1.1	Terminology amended. Definition of food business operator moved to glossary in the draft Code and the draft PG.
PG 62	Section 2.12.3	A2.1.2	Terminology amended.
PG 63	Section 2.12.4	A2.1.3	Terminology amended.
PG 64	Section 2.12.5	A2.1.4	No change.
PG 65	Section 2.12.5.1	A2.1.5	No change.
PG 66	Section 2.12.6	A2.2	No change.
PG 67	Section 2.12.6.1	A2.2.1	Terminology amended.
PG 68	Section 2.12.6.2	A2.2.2	No change.
PG 69	Section 2.12.6.3	A2.2.3	Provision relating to small quantities of primary products removed as duplicated guidance in section 8.7 of the draft PG.
PG 70	Section 2.12.6.4	A2.2.4	Terminology amended.
PG 71	Section 2.12.7	A2.2.5	Terminology amended.
PG 72	Section 2.12.8	A2.2.6	Terminology amended.
PG 73	Section 2.12.9	A2.2.7	Terminology amended.
PG 74	Section 2.12.10	A2.2.8	Terminology amended. Additional provision included relating to whether anything has changed at the food business establishment or whether it is solely an administrative change.

Reference	Current PG	Draft PG	Record of change to the PG
PG 75	Section 2.12.11	A2.4	No change.
PG 76	Section 2.12.11.1	A2.4.1	Terminology amended. Provisions relating to approved establishments removed as duplicated guidance in the approval of establishments guidance.
PG 77	Section 2.12.11.2	A2.4.2	Terminology amended.
PG 78	Section 2.12.11.3	A2.4.3	Terminology amended.
PG 79	Section 2.12.11.4	A2.4.4	Terminology amended.
PG 80	Section 2.12.12	A2.5	No change.
PG 81	Section 2.12.12.1	A2.5.1	Terminology amended.
PG 82	Section 2.12.12.2	A2.5.2	Terminology amended.
PG 83	Section 2.12.12.3	A2.5.3	Terminology amended.
PG 84	Section 2.12.12.4	A2.5.4	Terminology amended.
PG 85	Section 2.12.12.5	N/A	Section removed.
PG 86	Section 2.12.12.6	N/A	Section removed.
PG 87	Section 2.12.13	A2.6	No change.
PG 88	Section 2.12.13.1	A2.6.1	Terminology amended.
PG 89	Section 2.12.13.2	A2.6.2	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 90	Section 2.12.13.3	A2.6.3	Terminology amended.
PG 91	Section 2.12.13.4	A2.6.4	Section heading title amended. Terminology amended.
PG 92	Section 2.12.13.5	A2.6.5	Terminology amended.
PG 93	Section 2.12.13.6	A2.6.6	Terminology amended.
PG 94	Section 2.12.13.7	A2.6.7	Provisions relating to sources of information on mobile food establishments removed from PG as duplicated other guidance.
PG 95	Section 2.12.13.8	A2.6.8	Terminology amended.
PG 96	Section 2.13	Section 2.6	Provision added with link to approvals guidance.
PG 97	Section 2.13.1	N/A	Provisions relating to division of responsibilities between local authorities and FSA moved to section 2.4.4. Some detail removed as duplicated guidance in the approval of establishments guidance.
PG 98	Section 2.13.2	N/A	Reference to exemptions from approval removed moved to section 8.3.3 of the draft PG and provisions removed as duplicated guidance in the approval of establishments guidance.
PG 99	Section 2.13.3	Section 2.6.1	Terminology amended.
PG 100	Section 2.13.4	N/A	Provisions relating to applications for approval of more than one product removed as duplicated guidance in the approval of establishments guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 101	Section 2.13.5	N/A	Provisions relating to determination of approval removed as duplicated guidance in the approval of establishments guidance.
PG 102	Section 2.13.6	N/A	Provisions relating to conditional approval removed as duplicated guidance in the approval of establishments guidance.
PG 103	Section 2.13.7	N/A	Provisions relating to appeals removed as duplicated guidance in the approval of establishments guidance.
PG 104	Section 2.13.8	N/A	Provisions relating to change of activities, ownership or details removed as duplicated guidance in the approval of establishments guidance.
PG 105	Section 2.13.9	N/A	Provisions relating to notification of approval status removed as duplicated guidance in the approval of establishments guidance.
PG 106	Section 2.13.10	Section 2.6.2	Terminology amended.
PG 107	Section 2.13.11	N/A	Provisions relating to identification marks removed as duplicated guidance in the approval of establishments guidance.
PG 108	Section 2.13.12	N/A	Provisions relating to template forms removed as duplicated guidance in the approval of establishments guidance.
PG 109	Section 2.13.13	N/A	Provisions relating to further guidance removed as duplicated guidance in the approval of establishments guidance, and link to the guidance provided in section 2.6 of the draft PG.
PG 110	Section 2.14	N/A	Section heading removed.

Reference	Current PG	Draft PG	Record of change to the PG
PG 111	Section 2.14.1	NA	Provisions relating to list of registered food business establishments moved to section 2.6.2 of the draft Code.
PG 112	Section 2.14.2	Section 2.5.1	Terminology amended.
PG 113	Section 2.14.3	Section 2.5.2	Terminology amended. Provisions relating to information on size and scale of a business and the activities they undertake moved to section 2.6.3 of the draft Code.
PG 114	N/A	Section 2.5.3	Provisions relating to retention of records moved from section 2.14 of the current Code.
PG 115	Section 2.14.3.1	Section 2.5.3.1	Terminology amended. Link to guidance removed.
PG 116	Section 2.15	Section 2.4.2.1	Terminology amended.
PG 117	N/A	Section 2.8	Provision relating to the provision of discretionary services moved from section 2.8 of the current Code. Terminology amended.
PG 118	Section 3.1	Section 3.1	Terminology amended.
PG 119	Section 3.2	N/A	Section heading removed.
PG 120	Section 3.2.1	Section 3.2	Terminology amended.
PG 121	Section 3.2.2	Section 3.2.1	Terminology amended. Provisions relating to lead officer details moved from section 3.3.4 of the current Code.
PG 122	Section 3.2.3	N/A	Provisions relating to authorisation procedure moved to section 2.3.1 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 123	Section 3.2.4	Section 3.2.2	Provisions relating to authorisation procedure moved to sections 3.2.2.1 and 3.2.2.2 of the draft PG.
PG 124	N/A	Section 3.2.2.1	New section on guidance relating to appropriate supervision of officers.
PG 125	N/A	Section 3.2.2.2	Provisions relating to legislation under which officers are authorised moved from section 3.2.4 of the current PG. Terminology amended.
PG 126	Section 3.3	N/A	Section heading removed.
PG 127	Section 3.3.1	N/A	Section heading removed.
PG 128	Section 3.3.1.1	Section 3.2.3.2	Terminology amended and tables merged to avoid duplication.
PG 129	Section 3.3.1.2	N/A	Section removed as duplicated information in section 3.2.3.3 of draft Code.
PG 130	Section 3.3.2	Section 3.2.	Terminology amended. Provisions relating to awarding bodies and non-UK qualifications moved from section 3.4.3 of the current Code.
PG 131	N/A	Section 3.2.3.1	New section added to provide reference back to Code in relation to qualifications with restrictions.
PG 132	Section 3.4	N/A	Section heading removed.
PG 133	Section 3.4.1	Section 3.2.4	Terminology amended. Provision relating to definition of competency moved to section 3.2.4 of the draft Code. Provision relating to competency assessment tools moved to section 3.2.4.1 of the draft

Reference	Current PG	Draft PG	Record of change to the PG
			PG. Provisions relating to the Competency Framework removed, as duplicated guidance in the Competency Framework.
PG 134	Section 3.4.2	Section 3.2.4.2	Terminology amended.
PG 135	Section 3.4.3	Section 3.2.3	Terminology amended. Additional activities included to align with proposal 3.
PG 136	Section 3.4.4	Section 3.4	Terminology amended
PG 137	Section 3.4.5	Section 3.2.4.1	Terminology amended.
PG 138	Section 3.4.6	Section 3.2.4.1	Provision relating to assessing officer competency moved to section 3.2.4.1 of the draft Code. Provisions relating to evidence of competency moved from section 3.4.6 of current PG. Terminology amended.
PG 139	Section 3.4.7	Section 3.2.4.3	Terminology amended.
PG 140	Section 3.5	N/A	Section heading removed.
PG 141	Section 3.5.1	Section 3.3	Terminology amended. Provision relating to the training programme being included in authorisation procedure removed as duplicated provisions in section 2.2.17 of the draft PG.
PG 142	Section 3.5.2	N/A	Section removed and links to relevant training resources has been included in section 3.3 of the draft PG.
PG 143	Section 3.6	N/A	Section heading removed.

Reference	Current PG	Draft PG	Record of change to the PG
PG 144	Section 3.6.1	Section 3.3.1	Terminology amended. Provisions relating to professional body CPD removed as not directly applicable to delivery of official controls.
PG 145	Section 3.6.2	Section 3.3.1.1	Provisions relating to minimum number of CPD hours removed in line with proposal 5. Terminology amended.
PG 146	Section 3.6.3	Section 3.3.1.2	Terminology amended.
PG 147	Section 3.6.4	Section 3.3.1.3	Terminology amended.
PG 148	Section 4.1	Section 4.1	Terminology amended.
PG 149	N/A	Section 4.2	New section heading.
PG 150	Section 4.2	Section 4.2.1	Provision relating to choosing interventions moved to section 4.3 of the draft Code. Terminology amended.
PG 151	N/A	Section 4.2.1.1	New section, provisions relating to sources of information moved from section 4.3.1 of the current Code.
PG 152	N/A	Section 4.2.2.1	New section providing guidance on use of vulnerable risk group score.
PG 153	N/A	Section 4.2.2.2	New section providing guidance for food safety culture scoring.
PG 154	N/A	Section 4.3	New section, provisions relating to using other methods and techniques moved from section 4.4.1 of the current Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 155	Section 4.2.1	Section 4.3.1	Table of different methods and techniques removed. Flowchart added to reflect flexibilities in draft Code in relation to food hygiene methods and techniques.
PG 156	N/A	Section 4.3.2	New section, providing guidance on use of remote methods and techniques.
PG 157	N/A	Section 4.3.2.1	New section, providing guidance on use of questionnaires.
PG 158	Section 4.2.2	Section 4.3.4	Provisions relating to making food business operator aware of purpose of official control and discussions around non-compliances moved to section 4.4 of the draft Code. Remaining provisions moved to sections 4.3.4.1, 4.3.4.2 and 4.6.2 of the draft PG.
PG 159	N/A	Section 4.3.4.3	New section, provisions relating to concluding an inspection moved from section 4.2.2 of the current PG.
PG 160	Section 4.2.3	N/A	Provisions relating to factory and fishing vessels moved to section 4.4.1.8 of the draft PG.
PG 161	Section 4.2.4	N/A	Provisions relating to verification removed from PG as duplicated details in data returns guidance.
PG 162	Section 4.2.5	N/A	Provisions relating to monitoring and surveillance removed from PG as duplicated details in data returns guidance.
PG 163	Section 4.2.6	N/A	Provisions relating to sampling visits removed from PG as duplicated details in data returns guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 164	N/A	Section 4.5	New section heading.
PG 165	Section 4.2.7	Section 4.5.1	Terminology amended. Provisions relating to suspected non-compliances moved to section 4.5 of the draft Code. Provisions relating to recording of advice and education visits removed from PG, as duplicated details in data returns guidance.
PG 166	Section 4.2.8	N/A	Provisions relating to information and intelligence gathering removed from PG as duplicated details in data returns guidance.
PG 167	Section 4.2.9	N/A	Provisions relating to revisits removed as duplicated provisions in section 6.4.1 of the draft Code.
PG 168	Section 4.3	N/A	Section heading removed.
PG 169	Section 4.3.1	Section 4.4	Terminology and section heading amended. Additional examples provided of where notification may be necessary and duly justified.
PG 170	N/A	Section 4.6.2	Provisions relating to template forms moved from section 4.2.2 of the current PG.
PG 171	Section 4.3.2	N/A	Provisions relating to initial inspection of new establishments removed as duplicate provisions in section 4.2.3 of the draft PG.
PG 172	N/A	Section 4.2.4	New section added to align with proposals for initial official controls. Provision relating to information collected through communication with food business operator moved from section 4.2.4.1 of the current Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 173	Section 4.3.2.1	Section 4.2.4	Terminology amended. Provision relating to where an initial official control may be undertaken as a priority moved from section 4.2.4 of the current Code.
PG 174	N/A	Section 4.2.3.	New section added to align with proposal for initial official controls (proposal 1).
PG 175	N/A	Section 4.2.4	New section added to align with Code. Provision relating to seasonal business closures moved from section 4.3.1 of the current Code.
PG 176	Section 4.3.3	N/A	Section heading removed.
PG 177	Section 4.3.3.1	Section 4.3.4.1	Terminology amended.
PG 178	Section 4.3.3.2	Section 4.2.2	Terminology amended.
PG 179	Section 4.3.3.3	Section 4.3.4.2	Terminology amended.
PG 180	Section 4.3.4	Section 4.6	Terminology amended. Provision relating to multi-site businesses moved to section 4.6.1 of the draft PG. Provision relating to updating management information systems moved to section 4.6 of the draft Code.
PG 181	N/A	Section 4.6.1	New section. Provisions relating to multi-site businesses from moved from section 4.3.4 of the current PG.
PG 182	Section 4.4	Section 4.4.2	Provision relating to recital 15 of Regulation (EC) 852/2004 moved to section 4.4.2.1 of draft PG. Provision relating to food safety management systems providing assurances moved from section

Reference	Current PG	Draft PG	Record of change to the PG
			4.4.1.2 of current PG. Provisions relating to graduated approach removed as duplicated details in section 6.3.3 of the draft PG.
PG 183	Section 4.4.1	Section 4.4.2.1	Provisions relating to what compliance means in practice removed as duplicated details in Hazard Analysis Critical Control Points (HACCP) flexibilities guidance.
PG 184	Section 4.4.1.1	N/A	Provisions relating to seven principles of HACCP removed as duplicated details in HACCP flexibilities guidance.
PG 185	Section 4.4.1.2	Section 4.4.2.2 Section 4.4.2.3	Provisions relating to the role of the CA moved to sections 4.4.2.2 and 4.4.2.3 of draft PG.
PG 186	Section 4.5	N/A	Section heading removed.
PG 187	Section 4.5.1	N/A	Provisions relating to effective arrangements moved to section 4.7 of the draft PG. Provisions referencing legislation moved to section 4.7.3.1 of draft PG. Provision about purpose of PG removed as duplicated details in chapter 1 of the draft PG.
PG 188	Section 4.5.1.1	Section 4.7	Terminology amended. Provisions relating to effective arrangements moved from section 4.5.1 of current PG. Provisions relating to external transit storage facilities (ETSFs) removed as duplicated details in inland enforcement guidance. Provisions relating to risk-based arrangements moved to section 4.7.2.2 of the draft Code.
PG 189	Section 4.5.2	Section 4.7.3	Provisions relating to foods not of animal origin moved from section 4.5.9 of current PG.

Reference	Current PG	Draft PG	Record of change to the PG
PG 190	Section 4.5.2.1	Section 4.7.3.1	Provisions relating to Regulation (EU) 2017/625 and enforcement arrangements moved from section 4.5.1 of current PG. Terminology amended.
PG 191	Section 4.5.2.2	Section 4.7.3.2	Terminology amended.
PG 192	Section 4.5.2.3	Section 4.7.3.3	Terminology amended. Provisions relating to food of emerging risk removed as duplicated details in inland enforcement guidance.
PG 193	Section 4.5.2.4	N/A	Provisions relating to UK safeguard measures removed as duplicated details in inland enforcement guidance.
PG 194	Section 4.5.2.5	Section 4.7.3.4	Terminology amended.
PG 195	Section 4.5.3	Section 4.7.1.3	Terminology amended. Provisions relating to communication between CAs and to reference inland enforcement guidance removed as duplicated details in section 4.7 of the draft PG. Provision relating to BCPs authorised for higher risk commodities moved to section 4.7.2.1 of the draft Code. Provision relating to officers having access under the Aviation and Maritime Security Act 1990 moved to section 4.7.2 of draft PG.
PG 196	N/A	Section 4.7.2	New section. Provisions relating to monitoring of consignments moved from sections 4.5.3, 4.5.1.1 and 4.5.9.2 of current PG.
PG 197	N/A	Section 4.7.2.1	Provisions relating to carrying out regular checks moved from section 4.6.5 of the current Code.
PG 198	Section 4.5.4	N/A	Section heading removed.

Reference	Current PG	Draft PG	Record of change to the PG
PG 199	Section 4.5.4.1	Section 4.7.1.1	Terminology amended. Provision relating to identifying and recording importers moved to section 4.7.1 of the draft Code.
PG 200	Section 4.5.4.2	Section 4.7.2.2	Terminology amended. Provisions relating to maintaining information on food consignments moved to section 4.7.2.1 of the draft Code.
PG 201	Section 4.5.4.3	N/A	Provisions relating to arrangements for points of entry without a permanent CA presence removed as duplicated details section 4.7 of the draft PG.
PG 202	Section 4.5.5	N/A	Section heading removed.
PG 203	Section 4.5.5.1	Section 4.7.1.4	Provisions relating to information to be provided about nominated officers moved from section 4.6.1 of the current Code. Terminology amended.
PG 204	Section 4.5.5.2	Section 4.7.1.5	Terminology amended. Provisions on providing data on imported food enforcement activity removed as duplicated details in inland enforcement guidance.
PG 205	Section 4.5.5.3	N/A	Provisions relating to notification of incidents removed as duplicated details in section 5.2.1 of the draft PG.
PG 206	Section 4.5.5.4	N/A	Provisions relating to notification of illegal imports removed as duplicated details in inland enforcement guidance.
PG 207	Section 4.5.5.5	N/A	Provisions relating to prohibitions removed as duplicated details in inland enforcement guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 208	Section 4.5.6	Section 4.7.4	Terminology amended. Provisions relating to referring matters to inland CAs and points of entry moved to section 4.7.4 of the draft Code.
PG 209	Section 4.5.7	Section 4.7.1	Terminology amended. Provision relating to all businesses that import food being within official control programme moved to section 4.7.1 of the draft Code. Provision relating to inland enforcement guidance removed as duplicated details in section 4.7 of draft PG.
PG 210	Section 4.5.7.1	N/A	Provisions relating to deferred examination inland removed as duplicated details in inland enforcement guidance.
PG 211	Section 4.5.8	N/A	Section heading removed.
PG 212	Section 4.5.8.1	N/A	Provisions relating to considerations for sampling of imported food removed as duplicated details in inland enforcement guidance.
PG 213	Section 4.5.9	N/A	Provisions relating to official controls on food not of animal origin moved to section 4.7.3 of the draft PG.
PG 214	Section 4.5.9.1	Section 4.7.1.2	Terminology amended. Provision relating to checking manifests moved to section 4.7.1 of the draft Code.
PG 215	Section 4.5.9.2	N/A	Provisions relating to examination removed as duplicated details in inland enforcement guidance.
PG 216	Section 4.5.9.3	N/A	Provisions relating to deferred examinations removed as duplicated details in inland enforcement guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 217	Section 4.5.10	N/A	Provisions relating to onward transportation removed as duplicated details in inland enforcement guidance.
PG 218	Section 4.5.11	N/A	Provisions relating to fees moved to section 4.7.2.1 of the draft Code.
PG 219	Section 4.5.12	N/A	Provisions relating to retention of import documentation moved to section 4.7.2.1 of the draft Code.
PG 220	Section 4.5.13	N/A	Provisions relating to enforcement at points of entry and inland removed as duplicated details in inland enforcement guidance.
PG 221	Section 4.5.14	N/A	Section heading removed.
PG 222	Section 4.5.14.1	N/A	Provisions related to imported food legislation removed as duplicated details in inland enforcement guidance.
PG 223	Section 4.5.14.2	N/A	Provisions relating to the Trade in Animals and Related Products Regulations (Northern Ireland) 2011 removed as duplicated details in inland enforcement guidance.
PG 224	Section 4.5.14.3	N/A	Provisions relating to having arrangement to deal with illegally introduced products of animal origin (POAO) moved to section 4.7.1 of the draft Code. Other provisions removed as duplicated details in inland enforcement guidance.
PG 225	Section 4.5.14.4	N/A	Provisions relating to reporting of illegally imported POAO removed as duplicated details in inland enforcement guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 226	Section 4.6	Section 4.3.3	Provision relating to function of sampling moved from section 4.5 of current Code. Provisions relating to procuring samples moved to section 4.3.3.1 of draft PG. Provisions relating to what section covers and receipts for samples moved to section 4.3.3 of the draft Code.
PG 227	N/A	Section 4.3.3.1	Provisions relating to procurement of samples moved from section 4.6 of current PG. Terminology amended.
PG 228	Section 4.6.1	Section 4.3.3.5	Terminology amended.
PG 229	N/A	Section 4.3.3.8	Provisions relating to list of official laboratories moved from section 4.6.3 of current PG. Terminology amended.
PG 230	Section 4.6.2	Section 4.3.3.9	Provisions relating to samples which present difficulties in dividing into parts moved from section 4.6.6 of current PG. Terminology amended. Provision relating to use of single sample approach moved to section 4.3.3.2 of the draft Code.
PG 231	Section 4.6.3	Section 4.3.3.10	Terminology amended. Provisions relating to nature and quantity of sample and national sampling protocols moved to section 4.3.3.2 of the draft Code.
PG 232	Section 4.6.4	Section 4.3.3.11	Terminology amended. Provisions relating to suitable containers, sealing and labelling of samples moved to section 4.3.3.2 of the draft Code.
PG 233	Section 4.6.5	Section 4.3.3.12	Terminology amended. Provisions relating to storage and transport and submission of samples moved to section 4.3.3.2 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 234	Section 4.6.6	N/A	Provisions relating to samples presenting difficulties in dividing into parts moved to section 4.3.3.9 of draft PG.
PG 235	Section 4.6.7	N/A	Provisions relating to notification of formal sampling activity moved to section 4.3.3.2 of the draft Code.
PG 236	Section 4.6.8	N/A	Provisions relating to certificate of analysis moved to section 4.3.3.2 of the draft Code.
PG 237	Section 4.6.9	Section 4.3.3.13	Terminology amended. Provisions relating to notification of results moved to section 4.3.3.2 of the draft Code.
PG 238	Section 4.6.10	Section 4.3.3.14	Terminology amended.
PG 239	Section 4.6.11	Section 4.3.3.2	Terminology amended.
PG 240	N/A	Section 4.3.3.3	Provisions relating to continuity of evidence by CAs moved from section 4.6.12 of the current PG.
PG 241	Section 4.6.12	Section 4.3.3.4	Terminology amended. Provisions relating to continuity of evidence by CAs moved to section 4.3.3.3 of draft PG. Provisions relating to continuity and proof of postage moved to section 4.3.3.1 of the draft Code.
PG 242	Section 4.6.13	Section 4.3.3.15	No change.
PG 243	Section 4.6.14	Section 4.3.3.16	Terminology amended. Provision relating to quantity of sample moved to section 4.3.3.3 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 244	Section 4.6.15	Section 4.3.3.17	Terminology amended. Provisions relating to containers, handling and transport of samples moved to section 4.3.3.3 of the draft Code.
PG 245	Section 4.6.16	Section 4.3.3.19	Terminology amended. Provision relating to specimens being transported as soon as possible moved to section 4.3.3.3 of the draft Code.
PG 246	Section 4.6.17	N/A	Provisions relating to notification of formal sampling activity (examination) moved to section 4.3.3.3 of the draft Code.
PG 247	Section 4.6.18	N/A	Provisions relating to certificates of examination moved to section 4.3.3.3 of the draft Code.
PG 248	Section 4.6.19	Section 4.3.3.18	Terminology amended. Provisions relating to notification of results moved to section 4.3.3.3 of the draft Code.
PG 249	Section 4.6.20	N/A	Provisions relating to requests for examination moved to section 4.3.3.3 of the draft Code.
PG 250	Section 4.6.21	Section 4.3.3.6	Terminology amended. Provisions relating to requests from manufacturers or importers moved to section 4.3.3.1 of the draft Code.
PG 251	Section 4.6.22	N/A	Provisions relating to sampling of goods via distance communication moved to section 4.3.3.1 of the draft Code.
PG 252	Section 4.6.23	Section 4.3.3.7	Terminology amended. Provision relating to the right to a second opinion moved to section 4.3.3.1 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 253	N/A	Section 4.3.3.20	Provisions relating to scientific investigation of food complaint samples moved from section 6.3.3 of the current PG. Terminology amended.
PG 254	Section 4.7	N/A	Section heading removed.
PG 255	Section 4.7.1	Section 4.4.1	Provisions relating to legislation moved to section 4.4.1.1 of draft PG. Provisions relating to questionnaire moved to section 4.4.1.17 of draft PG.
PG 256	N/A	Section 4.4.1.1	Terminology amended. Provisions relating to applicable legislation moved from section 4.7.1 of the current PG.
PG 257	Section 4.7.2	Section 4.4.1.2	Terminology amended. Provisions relating to obtaining relevant information from airlines moved to section 4.4.1.3 of the draft Code. Provisions relating to service of notices moved to section 4.4.1.1 of the draft Code. Provisions relating to inspection reports moved to section 4.4.1.2 and 4.4.1.3 of the draft Code.
PG 258	Section 4.7.3	N/A	Provisions relating to catering waste removed as provisions the same for all establishments.
PG 259	Section 4.7.4	Section 4.4.1.3	Terminology amended. Provision relating to landfill sites removed as not relevant to undertaking official controls of ships or aircraft.
PG 260	N/A	Section 4.4.1.4	Terminology amended. Provisions relating to relevant information moved from section 4.7.8.6 of the current PG.

Reference	Current PG	Draft PG	Record of change to the PG
PG 261	Section 4.7.5	Section 4.4.1.5	Terminology amended. Provisions relating to security clearance moved to section 4.4.1.1 of the draft Code. Provisions relating to the frequency of official controls moved section 4.4.1.2 of the draft Code. Provisions relating to serving notices moved from section 4.7.2 of current PG. Provisions such as enforcement action being carried out in accordance with an enforcement policy removed as duplicated same for all establishments and covered elsewhere in draft PG.
PG 262	Section 4.7.6	Section 4.4.1.6	Terminology amended.
PG 263	Section 4.7.7	Section 4.4.1.7	Terminology amended. Provisions relating to contact details removed as no longer correct.
PG 264	Section 4.7.8	N/A	Section heading removed.
PG 265	Section 4.7.8.1	Section 4.4.1.8	Terminology amended. Provision relating to ship's master being aware of purpose of official control and determination of scope of activities moved to section 4.4.1.2 of the draft Code. Provisions relating to duties under the International Health Regulations 2005 moved from section 4.7.8.8 of current PG.
PG 266	Section 4.7.8.2	Section 4.4.1.9	Terminology amended. Provisions relating to training yachts moved from section 4.7.8.3 of the current PG. Provisions relating to criteria for determine whether an official control is appropriate moved from section 4.7.8.7 of current PG. Provisions relating to decision on whether to undertake official controls of vessels moved to section 4.4.1.2 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 267	Section 4.7.8.3	Section 4.4.1.10	Terminology amended. Provisions relating to training yachts moved to section 4.4.1.9 of the draft PG. Provision relating to consideration of available documentation moved from section 4.7.8.1 of current PG.
PG 268	Section 4.7.8.4	Section 4.4.1.11	Terminology amended. Provisions relating to action taken by recipients of information and sending copies of reports to other CAs moved from section 4.7.8.6 of current PG. Provisions relating to action to take on conclusion of an inspection, including discussion of findings moved to section 4.4.1.2 of the draft Code.
PG 269	Section 4.7.8.5	Section 4.4.1.12	Terminology amended. Provisions relating to FHRS moved to section 4.4.1.13 of draft PG.
PG 270	N/A	Section 4.4.1.13	Provisions relating to FHRS moved from section 4.7.8.5 of current PG.
PG 271	Section 4.7.8.6	Section 4.4.1.14	Terminology amended. Provisions relating to action taken by recipients of information and sending copies of reports to other CAs moved to section 4.4.1.11 of draft PG. Provisions relating to examples of relevant documentation moved to section 4.4.1.4 of draft PG.
PG 272	Section 4.7.8.7	N/A	Provisions relating to risk criteria moved to section 4.4.1.9 of draft PG.
PG 273	Section 4.7.8.8	N/A	Provisions relating to the International Health Regulations 2005 moved to section 4.4.1.8 of draft PG.

Reference	Current PG	Draft PG	Record of change to the PG
PG 274	Section 4.7.9	N/A	Section heading removed.
PG 275	Section 4.7.9.1	Section 4.4.1.15	Terminology amended. Provisions relating to decision to board an aircraft moved to section 4.4.1.3 of the draft Code. Provisions relating to information to obtain moved from section 4.7.9.2 of current PG. Provisions relating to adopting codes of practice moved from section 4.7.9.5 of the current PG. Provisions relating to how information obtained is used to determine whether to board an aircraft moved to section 4.4.1.16 of draft PG.
PG 276	Section 4.7.9.2	Section 4.4.1.16	Terminology amended. Provisions relating to how information obtained is used to determine whether to board an aircraft moved from section 4.7.9.1 of current PG. Provisions relating to information to obtain moved to section 4.4.1.15 of draft PG. Provision relating to liaison with airlines moved to section 4.4.1.3 of the draft Code.
PG 277	Section 4.7.9.3	Section 4.4.1.17	Terminology amended. Provisions relating to items to consider during an official control, other issues to consider and use of questionnaires moved from sections 4.7.9.4, 4.7.9.5 and 4.7.1 of current PG. Provisions relating to uncertainty in information provided moved to section 4.4.1.3 of the draft Code.
PG 278	Section 4.7.9.4	N/A	Provisions relating to items to consider during an official control moved to section 4.4.1.17 of draft PG.
PG 279	Section 4.7.9.5	N/A	Provisions relating to other issues to consider during an official control moved to section 4.4.1.17 of draft PG. Provision relating to flights in transit moved to section 4.4.1.3 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 280	N/A	Section 4.4.1.18	Terminology amended. Provisions relating to primary authority and home authority moved from sections 4.7.9.1 and 4.7.9.2 of current PG.
PG 281	Section 4.7.9.6	N/A	Provisions relating to action to take on conclusion of an official control moved to section 4.4.1.3 of the draft Code.
PG 282	Section 5.1	Section 5.1	Terminology amended.
PG 283	Section 5.2	Section 5.2	No change.
PG 284	Section 5.2.1	Section 5.2.1	Terminology amended.
PG 285	Section 5.2.2	Section 5.2.2	No change.
PG 286	Section 5.2.3	Section 5.2.3	Terminology amended.
PG 287	Section 5.2.4	Section 5.2.4	Terminology amended.
PG 288	Section 5.2.5	Section 5.2.5	Terminology amended. Provision relating to undertaking a root cause analysis moved to section 5.3.4 of the draft Code.
PG 289	Section 5.3	Section 5.3	No change.
PG 290	Section 5.3.1	Section 5.3.1	Contact details updated.
PG 291	Section 5.3.2	Section 5.3.2	No change.
PG 292	Section 5.4	Section 5.4	Terminology amended.
PG 293	Section 5.4.1	Section 5.4.1	No changes

Reference	Current PG	Draft PG	Record of change to the PG
PG 294	Section 5.4.2	Section 5.4.2	Terminology amended.
PG 295	Section 5.4.3	N/A	Provision relating to trans-border matters removed, as only provided that the section was under review.
PG 296	Section 5.4.4	Section 5.4.3	Section heading renamed. Terminology amended.
PG 297	Section 5.4.5	Section 5.4.4	Terminology amended.
PG 298	N/A	Section 5.5	New section regarding the National Food Crime Unit added.
PG 299	Section 6.1	Section 6.1	Terminology amended.
PG 300	Section 6.2	Section 6.2	Heading amended.
PG 301	Section 6.2.1	N/A	Provision relating to powers to carry out official food controls removed. Provision relating to entering a premises moved to section 6.2.1 of draft PG. Terminology amended.
PG 302	Section 6.2.2	N/A	Provision relating to powers to carry out official food controls removed. Provision relating to entering a premises moved to section 6.2.1 of draft PG. Terminology amended.
PG 303	Section 6.2.3	N/A	Provision relating to powers to carry out official food controls removed. Provision relating to entering a premises moved to section 6.2.1 of draft PG. Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 304	Section 6.2.4	N/A	Provision relating to powers to carry out official food controls removed. Provision relating to entering a premises moved to section 6.2.1 of draft PG. Terminology amended.
PG 305	Section 6.3	N/A	Provision relating to food complaints removed as not specifically relevant to the enforcement chapter.
PG 306	Section 6.3.1	N/A	Provision relating to food complaints removed as not specifically relevant to the enforcement chapter.
PG 307	Section 6.3.2	N/A	Provision relating to food complaints removed as not specifically relevant to the enforcement chapter. Provision regarding involvement of other Competent Authorities duplicated in section 2.5.1 of draft Code and PG.
PG 308	Section 6.3.3	N/A	Provisions relating to food samples removed as sampling provisions available in section 4.3.3 of draft PG.
PG 309	Section 6.4	Section 6.3	Title amended.
PG 310	Section 6.4.1	Section 6.3.1	Title amended. Terminology amended. Provision relating to enforcement action taken removed as duplicated in section 6.3.4 of draft Code. Provision relating to providing advice moved to section 6.3.2 of draft PG. Provision relating to determining appropriate action moved to section 6.3.3 of draft PG.
PG 311	N/A	Section 6.3.2	New section to provide information relating to advice and education. Provisions moved from section 6.4.1 of current PG. Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 312	N/A	Section 6.3.3	New section to provide information relating to determining appropriate enforcement action. Provision relating to determining appropriate action moved from section 6.4.1 of current PG. Provisions relating to Primary Authority moved from sections 4.2.2 and 6.2 of current Code. Provisions relating to the Code for Prosecutors moved from section 6.2 of current Code. Provision regarding discussing decisions moved from section 6.4.2 of current Code. Terminology amended.
PG 313	Section 6.4.2	N/A	Provision relating to enforcement information removed as provisions duplicated in section 2.3 of draft Code.
PG 314	Section 6.4.3	Section 6.9.3	Terminology amended.
PG 315	Section 6.5	Section 6.2	Title amended.
PG 316	Section 6.5.1	Section 6.2.1	Table added with provisions relating to powers of entry from sections 6.2.1 – 6.2.4 of current PG. Provision relating to regulation 33 of TARP included. Terminology amended.
PG 317	Section 6.5.2	N/A	Provisions relating to powers to stop vehicles removed due to risk the guidance goes beyond powers of entry provided in legislation.
PG 318	Section 6.5.3	Section 6.2.2	No change.
PG 319	Section 6.6	Section 6.4	No change.
PG 320	Section 6.6.1	Section 6.4.1	No change.

Reference	Current PG	Draft PG	Record of change to the PG
PG 321	Section 6.6.2	N/A	Provisions relating to considerations when issuing a notice moved to section 6.4 of draft Code. Provisions relating to enforcement policy and hierarchy of enforcement duplicated in section 6.3.4 of draft Code. Terminology amended.
PG 322	Section 6.6.3	Section 6.4.2	Terminology amended
PG 323	Section 6.6.4	Section 6.4.3	Terminology amended.
PG 324	Section 6.6.5	Section 6.4.4	Terminology amended. Provisions relating to content of a notice removed as duplicated guidance in sections 6.3.5 and 6.4 of draft Code. Provisions relating to time limits removed as guidance on time limits available in section 6.4.5 of draft PG.
PG 325	Section 6.6.6	Section 6.4.5	Terminology amended.
PG 326	Section 6.6.7	Section 6.4.6	Terminology amended.
PG 327	Section 6.6.8	Section 6.4.7	Terminology amended.
PG 328	Section 6.6.9	Section 6.4.7.1	Provisions relating to service of notice removed as duplicated provisions in section 6.4 of draft Code.
PG 329	Section 6.6.10	N/A	Sub-heading for service of notices removed.
PG 330	Section 6.6.10.1	Section 6.4.8	Terminology amended.
PG 331	Section 6.6.11	Section 6.4.9	Terminology amended.
PG 332	Section 6.6.12	Section 6.4.10	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 333	Section 6.6.13	Section 6.4.11	Terminology amended.
PG 334	Section 6.6.14	Section 6.4.12	Terminology amended. Provision relating to checking work moved to section 6.4.2 of draft Code.
PG 335	Section 6.6.15	Section 6.4.13	Terminology amended.
PG 336	Section 6.6.16	Section 6.4.14	Terminology amended.
PG 337	Section 6.6.17	Section 6.4.15	Information regarding other guidance moved to new section 6.4.16 in draft PG.
PG 338	N/A	6.4.16	New section with information regarding other guidance moved from section 6.4.17 of the current PG.
PG 339	Section 6.7	Section 6.5	Terminology amended.
PG 340	Section 6.7.1	Section 6.5.1	Terminology amended.
PG 341	6.7.2	Section 6.5.2	Terminology amended.
PG 342	Section 6.7.3	Section 6.5.3	Terminology amended.
PG 343	Section 6.7.4	Section 6.5.4	No change.
PG 344	Section 6.7.5	Section 6.5.5	No change.
PG 345	Section 6.7.6	Section 6.5.6	No change.
PG 346	Section 6.8	Section 6.6	No change.

Reference	Current PG	Draft PG	Record of change to the PG
PG 347	Section 6.8.1	Section 6.6.1	Terminology amended.
PG 348	Section 6.8.1.1	Section 6.6.2	Terminology amended.
PG 349	Section 6.8.1.2	Section 6.6.3	Terminology amended.
PG 350	Section 6.8.2	Section 6.6.4	Terminology amended.
PG 351	Section 6.8.2.1	Section 6.6.4.1	Terminology amended.
PG 352	Section 6.8.2.2	N/A	Terminology amended.
PG 353	Section 6.8.3	Section 6.6.5	Terminology amended.
PG 354	Section 6.8.3.1	Section 6.6.5.1	Section heading amended. Terminology amended.
PG 355	Section 6.8.3.2	Section 6.6.5.2	Section heading amended. Terminology amended.
PG 356	Section 6.8.3.3	Section 6.6.5.3	Section heading amended. Terminology amended.
PG 357	Section 6.8.4	Section 6.6.6	Terminology amended.
PG 358	Section 6.8.5	Section 6.6.7	Terminology amended.
PG 359	Section 6.8.6	Section 6.6.8	Terminology amended.
PG 360	Section 6.8.6.1	Section 6.6.8.1	Terminology amended.
PG 361	Section 6.8.7	Section 6.6.9	Terminology amended.
PG 362	Section 6.8.7.1	Section 6.6.9.1	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 363	Section 6.8.7.2	Section 6.6.9.2	Terminology amended.
PG 364	Section 6.8.7.3	Section 6.6.9.3	Terminology amended.
PG 365	Section 6.8.7.4	Section 6.6.9.4	Terminology amended.
PG 366	Section 6.9	Section 6.6.10	No change
PG 367	Section 6.9.1	Section 6.6.10.1	Terminology amended. Link to HEPN added.
PG 368	Section 6.9.2	Section 6.6.10.26	No change.
PG 369	Section 6.9.3	Section 6.6.11	Terminology amended.
PG 370	Section 6.10	Section 6.6.12	Terminology amended.
PG 371	Section 6.11	Section 6.6.13	No changes.
PG 372	Section 6.11.1	Section 6.6.13.1	Terminology amended. Link added.
PG 373	Section 6.11.2	Section 6.6.13.2	Terminology amended.
PG 374	Section 6.11.3	Section 6.6.13.3	Terminology amended.
PG 375	Section 6.12	Section 6.6.14	Terminology amended. Reference to legislation moved from text to footnote.
PG 376	Section 6.13.	Section 6.7	No change.
PG 377	Section 6.13.1	Section 6.7.1	Terminology amended.
PG 378	Section 6.13.2	Section 6.7.2	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 379	Section 6.13.2.1	Section 6.7.2.1	Terminology amended.
PG 380	Section 6.13.2.2	Section 6.7.2.2	Terminology amended.
PG 381	Section 6.13.2.3	Section 6.7.2.3	Terminology amended.
PG 382	Section 6.13.3	Section 6.7.3	Terminology amended.
PG 383	Section 6.13.3.1	Section 6.7.4	Terminology amended.
PG 384	Section 6.13.4.1	Section 6.7.5	Terminology amended.
PG 385	Section 6.13.4.1	Section 6.7.5.1	Terminology amended.
PG 386	Section 6.13.4.2	Section 6.7.5.2	Terminology amended.
PG 387	Section 6.13.4.3	Section 6.7.5.3	Terminology amended.
PG 388	Section 6.13.5	Section 6.7.6	No change.
PG 389	Section 6.13.5.1	Section 6.7.6.1	Terminology amended.
PG 390	Section 6.13.5.2	Section 6.7.6.2	Terminology amended.
PG 391	Section 6.13.5.3	Section 6.7.6.3	Terminology amended.
PG 392	Section 6.13.5.4	Section 6.7.6.3	Terminology amended and more information provided.
PG 393	Section 6.13.6	Section 6.7.7	Terminology amended.
PG 394	Section 6.14	Section 6.8	No change.

Reference	Current PG	Draft PG	Record of change to the PG
PG 395	Section 6.14.1	Section 6.8.1	Terminology amended.
PG 396	Section 6.14.2	Section 6.8.2	Terminology amended.
PG 397	Section 6.14.3	Section 6.8.3	Terminology amended.
PG 398	N/A	Section 6.9	New section including provisions moved from section 6.4 of current PG. Terminology amended.
PG 399	N/A	Section 6.10	New section on follow-up checks including provisions moved from section 4.2.9 of current PG.
PG 400	Section 6.15	Section 6.11	No change.
PG 401	Section 6.15.1	Section 6.11.1	No change.
PG 402	Section 6.15.2 Section 6.15.3	N/A	Section 6.15.2 and 6.15.3 of current PG removed due to duplication of information in approvals guidance. Link to approvals guidance included in section 6.11.1 of draft PG.
PG 403	Section 6.15.4	Section 6.11.2	Terminology amended.
PG 404	Section 6.15.5	Section 6.11.3	Terminology amended.
PG 405	Section 6.15.6	Section 6.11.4	Terminology amended.
PG 406	Section 6.15.6.1	Section 6.11.5	No change.
PG 407	Section 6.16	Section 6.12	No change.
PG 408	Section 6.16.1	Section 6.12.1	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 409	Section 6.16.1.1	Section 6.12.1.1	No change.
PG 410	Section 6.16.1.2	Section 6.12.1.1	Terminology amended.
PG 411	Section 6.16.1.3	Section 6.12.1.3	Terminology amended.
PG 412	Section 6.16.1.4	Section 6.12.1.4	Terminology amended.
PG 413	Section 6.16.1.5	Section 6.12.1.5	Terminology amended.
PG 414	Section 6.16.1.6	Section 6.12.1.6	Terminology amended.
PG 415	Section 6.16.1.7	Section 6.12.1.7	Terminology amended.
PG 416	Section 6.16.2	Section 6.12.2	Terminology amended.
PG 417	Section 6.16.3	Section 6.12.3	Terminology amended.
PG 418	Section 6.17	Section 6.13	Terminology amended.
PG 419	Chapter 7	Chapter 7	Chapter title changed.
PG 420	Section 7.1	Chapter 7	Section title changed to Chapter title
PG 421	Section 7.1.1	Section 7.1	Terminology amended. Provisions relating to classifying production and relaying areas, classification categories and monitoring removed as duplication with FSA live bivalve mollusc (LBM) guidance.
PG 422	Section 7.1.2	Section 7.2	Terminology amended. Provisions relating to allowances for small quantities moved from section 7.1.2.1 of current PG.

Reference	Current PG	Draft PG	Record of change to the PG
PG 423	Section 7.1.2.1	N/A	Section header removed as provisions relating to allowances for small quantities of LBM moved to section 7.2 of draft PG.
PG 424	Section 7.1.4	N/A	Provisions regarding permitted treatment methods removed due to duplication with other FSA LBM and/or approvals guidance.
PG 425	Section 7.1.5	Section 7.4	Terminology amended. List of local and national organisations FSA should liaise with extended.
PG 426	Section 7.1.6	N/A	Provisions relating to classification requirements removed due to duplication with other FSA LBM guidance. Provision relating to a list of classified LBM production and relaying areas moved to section 7.3.1 of draft PG.
PG 427	Section 7.1.7	Sections 7.4.1 - 7.4.3	Provisions relating to the examination, monitoring and verification of registration documents merged into sections 7.4.1, 7.4.2 and 7.4.3 of draft PG.
PG 428	Section 7.1.8 to 7.1.12		Sections removed as they related to FBO requirements/advice and or duplicate other FSA advice.
PG 429	Section 7.1.8	N/A	Provision relating to sampling of LBM by FBOs removed due to duplication with other FSA LBM guidance.
PG 430	Section 7.1.9	N/A	Provision relating to laboratories used removed due to duplication with other FSA LBM guidance.
PG 431	Section 7.1.10	N/A	Provision relating to testing of LBM removed due to duplication with other FSA LBM guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 432	Section 7.1.11	N/A	Provision relating to marine biotoxins removed due to duplication with other FSA LBM guidance.
PG 433	Section 7.1.12	N/A	Provision relating to sampling removed due to duplication with other FSA LBM guidance.
PG 434	Section 7.1.13	Section 7.7	Terminology amended.
PG 435	Section 7.1.14	N/A	Provisions relating to LBM which fail to satisfy requirements moved to section 7.6 of draft Code.
PG 436	N/A	Section 7.3	New section providing information relating to production and relaying areas.
PG 437	N/A	Section 7.3.1	New section providing information relating to classification and monitoring of production and relaying areas. Provisions relating to a list of classified areas moved from section 7.1.6 of current PG.
PG 438	Section 7.1.15	Section 7.3.2	Relocated
PG 439	N/A	Section 7.5	New section providing information relating to action following a non-compliant sample.
PG 440	Section 7.1.16	Section 7.5.1	Title amended. Terminology amended. Provisions relating to notification and display of Closure Notices moved from section 7.5 of current Code.
PG 441	Section 7.1.17	Section 7.6	Terminology amended.
PG 442	Section 7.1.18	Section 7.8	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 443	Section 7.1.19	Section 7.9	Terminology amended.
PG 442	N/A	Section 8.1	New section to provide information relating to content of the chapter and link to FSA approvals guidance.
PG 445	Section 7.2	Section 8.2	No change.
PG 446	Section 7.2.1	Section 8.2.1	No change.
PG 447	Section 7.2.2	Section 8.2.2	No change.
PG 448	Section 7.2.3	Section 8.2.3	No change.
PG 449	Section 7.2.4	Section 8.2.4	No change.
PG 450	Section 7.2.5	Section 8.2.5	No change.
PG 451	Section 7.2.6	Section 8.2.6	No change.
PG 452	Section 7.2.7	Section 8.2.7	Title amended. Terminology amended. Provision relating to Seafish guidance provided.
PG 453	Section 7.3	Section 8.3	No change.
PG 454	Section 7.3.1	N/A	Provision regarding meat diary removed.
PG 455	Section 7.3.2	Section 8.3.1	Terminology amended. Provision relating to approvals guidance removed as duplicated in section 8.1 of draft PG.
PG 456	Section 7.3.3	Section 8.3.2	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 457	Section 7.3.3.1	Section 8.3.2.1	Terminology amended.
PG 458	Section 7.3.3.2	Section 8.3.2.2	Terminology amended.
PG 459	Section 7.3.3.3	N/A	Provision relating to cold stores removed due to duplication with FSA approvals guidance.
PG 460	Section 7.3.3.4	Section 8.3.2.3	Terminology amended. Provisions relating to wild game amended due to duplication with other FSA wild game guidance and link provided.
PG 461	Section 7.3.3.5	N/A	Provision relating to edible co-products removed due to duplication with FSA approvals guidance. Provisions relating to separate guidance removed as no separate guidance available.
PG 462	Section 7.3.4	Section 8.3.3	Terminology amended.
PG 463	Section 7.3.4.1	N/A	Provisions relating to exemptions from approval removed due to duplication with FSA approvals guidance.
PG 464	Section 7.3.4.2	N/A	Provisions relating to exemptions from approval removed due to duplication with FSA approvals guidance.
PG 465	Section 7.3.4.3	N/A	Provisions relating to exemptions from approval removed due to duplication with FSA approvals guidance.
PG 466	Section 7.3.4.4	N/A	Provision relating to wild game removed due to duplication with FSA approvals and wild game guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 467	Section 7.3.4.5	Section 8.3.3.1	Terminology amended.
PG 468	Section 7.3.5	Section 8.3.4	No change.
PG 469	Section 7.3.6	Section 8.3.5	Title amended. Terminology amended.
PG 470	Section 7.3.7	N/A	Provision relating to wild game sector removed due to duplication with FSA wild game guidance.
PG 471	Section 7.3.8	Section 8.3.6	No change.
PG 472	Section 7.3.9	Section 8.3.7	No change.
PG 473	N/A	Section 8.3.8	New section on transport of meat above temperature added.
PG 474	Section 7.4	Section 8.4	No change.
PG 475	Section 7.4.1	Section 8.4.1	No change.
PG 476	Section 7.4.2	Section 8.4.2	Terminology amended. Provisions relating to enforcement activities moved from section 7.4.3 of current PG.
PG 477	Section 7.4.3	Section 8.4.3	Terminology amended. Provisions relating to enforcement activities moved to section 8.4.2 of draft PG.
PG 478	Section 7.4.4		Section removed.
PG 479	Section 7.4.5		Section removed.
PG 480	Section 7.4.6	Section 8.4.4	Terminology amended. Provisions relating to heat treatment removed due to duplication with section 8.4.8 of draft PG.

Reference	Current PG	Draft PG	Record of change to the PG
PG 481	Section 7.4.7	Section 8.4.5	Terminology amended. Provisions relating to time and temperature for treated milk moved to section 8.4.6 of draft PG.
PG 482	Section 7.4.8	Section 8.4.6	Terminology amended. Provisions relating to time and temperature for treated milk moved from section 7.4.7 of current PG.
PG 483	Section 7.4.9	Section 8.4.7	Terminology amended.
PG 484	Section 7.4.10	Section 8.4.8	No change.
PG 485	Section 7.4.11	Section 8.4.9	No change.
PG 486	Section 7.4.11.1	Section 8.4.9.1	Terminology amended.
PG 487	Section 7.4.11.2	Section 8.4.9.2	No change.
PG 488	Section 7.4.11.3	N/A	Provision relating to summary of legislative background for raw milk and dairy products removed as the referenced guidance 'Milk Hygiene on the Dairy Farm Guide' is archived.
PG 489	Section 7.4.11.4	Section 8.4.9.3	Terminology amended. Additional provisions relating to actions to be taken on stocks of raw milk-based products following loss of OFT status added.
PG 490	Section 7.4.11.5	N/A	Section removed.
PG 491	Section 7.4.11.6	Section 8.4.9.4	Terminology amended.
PG 492	Section 7.5	Section 8.5	No change.

Reference	Current PG	Draft PG	Record of change to the PG
PG 493	Section 7.5.1	Section 8.5.1	No change.
PG 494	Section 7.5.2	Section 8.5.2	No change.
PG 495	Section 7.5.3	Section 8.5.3	Terminology amended. New provision added.
PG 496	Section 7.5.4	Section 8.5.4	Terminology amended.
PG 497	Section 7.5.5	N/A	Provision relating to assurance schemes removed as provisions not relevant to regulations within section 8.5.1 of draft PG.
PG 498	Section 7.6	Section 8.6	No change.
PG 499	Section 7.6.1	Section 8.6.1	No change.
PG 500	Section 7.6.2	Section 8.6.2	No change.
PG 501	Section 7.6.3	Section 8.6.3	No change.
PG 502	Section 7.6.4	Section 8.6.4	No change.
PG 503	Section 7.6.5	Section 8.6.5	No change.
PG 504	Section 7.6.6	Section 8.6.6	Title amended. No change.
PG 505	Section 7.6.7	Section 8.6.7	No change.
PG 506	Section 7.6.8	Section 8.6.8	No change.
PG 507	Section 7.6.9	Section 8.6.9	No change.
PG 508	Section 7.6.10	Section 8.6.10	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 509	N/A	Section 8.7	New section providing information relating to small quantities.
PG 510	N/A	Section 8.7.1	New section providing information relating to small quantities of primary products.
PG 511	Section 7.7	Section 8.8	Title amended. Terminology amended. Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 512	Section 7.7.1	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 513	Section 7.7.2	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 514	Section 7.7.2.1	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 515	Section 7.7.2.2	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 516	Section 7.7.3	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 517	Section 7.7.4	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 518	Section 7.7.5	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 519	Section 7.7.6	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 520	Section 7.7.7	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 521	Section 7.7.8	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 522	Section 7.8	Section 8.9	No change.
PG 523	Section 7.8.1	Section 8.9.1	Terminology amended.
PG 524	Section 7.8.2	Section 8.9.2	Terminology amended.
PG 525	Section 7.8.3	Section 8.9.3	Terminology amended.
PG 526	Section 7.8.4	Section 8.9.4	Terminology amended.
PG 527	Section 7.8.5	Section 8.9.5	Terminology amended.
PG 528	Section 7.8.6	Section 8.9.6	Terminology amended.
PG 529	Section 7.8.7	Section 8.9.7	Terminology amended.
PG 530	Section 7.8.8	Section 8.9.8	Terminology amended.
PG 531	Section 7.8.9	Section 8.9.9	Terminology amended.
PG 532	Section 7.8.10	Section 8.9.10	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 533	Section 7.8.11	Section 8.9.11	Terminology amended.
PG 534	Section 7.8.12	Section 8.9.12	Terminology amended.
PG 535	Section 7.9	Section 8.10	No change.
PG 536	Section 7.9.1	Section 8.10.1	Terminology amended.
PG 537	Section 7.9.2	Section 8.10.2	Title amended. Terminology amended. Provisions relating to bottled water removed due to duplication with Defra guidance.
PG 538	Section 7.9.3	Section 8.10.3	Provisions relating to natural mineral waters removed due to duplication with Defra guidance. Links provided.
PG 539	Section 7.9.4	Section 8.10.3.1	Provisions relating to natural mineral waters removed due to duplication with Defra guidance. Links provided.
PG 540	Section 7.9.5	N/A	Provisions relating to natural mineral waters removed due to duplication with Defra guidance.
PG 541	Section 7.9.6	N/A	Provisions relating to natural mineral waters removed due to duplication with Defra guidance.
PG 542	Section 7.9.7	N/A	Provisions relating to bottled water removed due to duplication with Defra guidance.
PG 543	N/A	Section 8.10.4	New section added regarding the Windsor Framework.
PG 544	Section 7.10	Section 8.11	No change.

Reference	Current PG	Draft PG	Record of change to the PG
PG 545	Section 7.10.1	Section 8.11.1	Terminology amended.
PG 546	N/A	Section 8.11.2	New section providing information relating to catering waste. Provisions moved from section 4.7.3 of current PG. Terminology amended.
PG 547	Section 7.10.2	Section 8.11.3	Title amended. Terminology amended.
PG 548	Section 7.10.3	Section 8.11.4	Terminology amended. Provision relating to 'Industry Guide to Edible co-products and Animal By-products' guidance removed as link unavailable.
PG 549	Section 7.10.4	Section 8.11.5	Terminology amended.
PG 550	Section 7.10.5	Section 8.11.6	No change.
PG 551	Section 7.10.6	Section 8.11.7	Terminology amended.
PG 552	Section 7.10.7	Section 8.11.8	Terminology amended.
PG 553	Section 7.11	Section 8.12	No change.
PG 554	Section 7.11.1	Section 8.12.1	Provision relating to location of seller moved from section 7.11.2 of current PG. Terminology amended. Provisions relating to legislation and central UK Competent Authority moved from 7.11.5 of current PG. Terminology amended.
PG 555	Section 7.11.2	N/A	Provision relating to location of seller moved to section 8.12.1 of draft PG.

Reference	Current PG	Draft PG	Record of change to the PG
PG 556	Section 7.11.3	Section 8.12.2	Terminology amended.
PG 557	Section 7.11.4	Section 8.12.3	Terminology amended.
PG 558	Section 7.11.5	N/A	Title amended. Terminology amended. Provisions relating to legislation and central UK Competent Authority moved to section 8.12.1 of draft PG.
PG 559	Section 7.11.6	Section 8.12	Terminology amended.
PG 560	Section 7.12	Section 8.13	No change.
PG 561	Glossary	Glossary	Terminology amended. Definitions for terms not used in PG removed.

Annex C: Potential future developments

This annex outlines future potential developments that we are seeking early stakeholder views on.

Qualifications

To address feedback from LA engagement events held in April/May 2024, the FSA has done some early thinking about the management of qualifications that we endorse as 'suitable' qualifications.

We would like to seek views from stakeholders to inform our options appraisal and policy development at this early stage. It is envisaged that once we gather views via this consultation, that further stakeholder engagement and consultation will be undertaken to inform any final decision.

Current approach

The Official Control Regulations requires CAs to have access to a sufficient number of suitably qualified and experienced officers. The 'suitable qualification' requirement is currently referenced in the Code and defined as statutory guidance via the list of FSA endorsed qualifications.

Existing or prospective CA officers who do not hold one of these qualifications but who may have a range of qualifications, additional training and experience that together indicate their competence can request an 'equivalency assessment' from a relevant professional or awarding body and fees may be payable. These are carried out on an individual basis and the professional body should inform the FSA.

To make changes to the Code, such as when a new qualification is endorsed, the FSA must follow a prescribed administrative process. This includes undertaking a formal consultation (usually 12 weeks) and seeking Ministerial approval for the changes.

We do not currently have formal procedures or governance in place for the FSA to consider and endorse new qualifications and are currently working to develop these.

What we are seeking views on

One of the options that we are considering, would involve changing where the FSA endorsed list of qualifications is published. The option that we are seeking views on would retain the requirement in the Code that officers are suitably qualified.

The list of endorsed qualifications would then be removed from the Code and published in the PG. We are seeking to understand stakeholders' views on perceived advantages, disadvantages and impacts of this option.

Introduction of governance procedures for qualifications

It is clear from our research and engagement with stakeholders to date, that there are gaps in our governance of qualifications. These need to be addressed.

FSA officials have been drafting governance procedures for how existing and future qualifications will be considered, assessed and endorsed by the FSA as being suitable. The draft procedures will be agreed across the three nations and ensure engagement with key experts in this process including local authorities, education providers, relevant professional bodies and relevant government departments.

Our aim is that the final governance procedures will provide sufficient scrutiny and stakeholder engagement to ensure that:

- there are defined criteria that any qualification must adhere to in order to be endorsed by the FSA
- the content of proposed new qualifications meets and maintains professional standards
- there is a procedure to assess qualifications which are not yet listed as 'suitable' for example if a new qualification is developed or LAs want to check a qualification that is not already included in the list
- we have a consistent approach to decision making when assessing new qualifications and routinely reviewing existing qualifications which takes into account input from expert stakeholders
- the syllabus content of courses keeps pace with the demands of the regulatory landscape

It is anticipated that these procedures, once finalised, will be published on the FSA's website and will apply to new and existing qualifications regardless of whether they remain published in the Code or transferred to the PG.

We also anticipate that this governance procedure, when developed, would include an expert panel of stakeholders with representation from across the four nations as required. This panel would review and assess new qualifications for their fitness for purpose before deciding if the FSA should endorse these qualifications.

Rationale for considering moving the endorsed list of suitable qualifications from the Code to the Practice Guidance

In November 2023, the FSA published [research into LA Capacity and Capability](#).

One of the findings of this research was that the current qualifications framework is too restrictive, and a recommendation was made that we seek to introduce more flexible and modular routes to qualification.

During LA stakeholder engagement events across England, Northern Ireland and Wales in April/May 2024, three options were presented to local authorities. These ranged from maintaining the status quo, moving to a fully competency only model or maintaining lists

of qualifications but introducing more flexibility and modularity. We also asked an open question to identify other options that we had not considered.

During the LA engagement events, some CAs highlighted that they had applications for jobs from people who they thought were likely to have the skills and competencies required to deliver Official Food and Feed Controls. However, because their qualifications were not listed as suitable in the Code, their HR teams did not give them permission to employ them. This was perceived as an unnecessary barrier.

We have also been approached by two professional bodies in the last year to recognise new qualifications as suitable and did not have an existing mechanism to consider these which led to a longer than necessary lead in time for us to consider and endorse the qualifications.

The list of FSA endorsed suitable qualifications is currently published in the Code. If we need to update the Code, the FSA must follow a prescribed administrative process. This includes undertaking a formal statutory consultation (usually a minimum of 12 weeks) and seeking Ministerial approval for the changes to the Code. The Minister does not scrutinise specific qualifications and relies on the FSA to advise them of their suitability.

To manage FSA resources, we currently brigade a number of changes to the Code together for the purposes of consultation. This means that when we want to update the list of qualifications, we have to wait until the next review of the Code. This can delay updates to the list of qualifications. Due to the cyclical nature of updates to the Code, it could mean that a suitable qualification is available for a number of years before it could be included in the Code.

In contrast, the PG can be amended subject to stakeholder engagement but does not require the same level of administrative process as a statutory consultation. However, similar to the Code, FSA currently brigade changes to the PG together to manage FSA resources and burdens on stakeholders and the PG is also updated in a cyclical nature.

The option being considered would propose that if the qualification governance panel was satisfied that a qualification should be endorsed, that the PG would be updated to reflect a revised list of FSA endorsed qualifications. This would allow for a more expedient update of the list compared to updating the Code, as no formal consultation would be required. However, improvements in expediency will be dependent upon the effective revision of the FSA processes for updating the PG. The intention is that the agreed process would ensure that we would not arrive in a position where an existing qualification could be removed from the list in a way that would mean existing authorised officers no longer hold a 'suitable qualification'.

Feedback from professional bodies, LAs and industry (who employ apprentices) is that they will not sponsor a route to qualification unless they have full confidence that the FSA will formally recognise it. The delays associated with our current process of updating

qualifications in the Code could affect the flow of new entrants into the profession and becomes a barrier to addressing the shortage of qualified food officers and recruitment challenges faced by some LAs.