

## **Review of the Food Law Code of Practice (England)**

**Launch date: 24<sup>th</sup> February 2025**

**Respond by: 19<sup>th</sup> May 2025**

### **This consultation will be of most interest to**

- Competent Authorities – Local Authorities and Port Health Authorities
- Food businesses and industry trade bodies
- Third-party assurance organisations for food safety
- Awarding bodies for environmental health and trading standards 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 Food Law 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 an ‘appropriate 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 a prescriptive number of hours required for continuing professional development (CPD)
6. other amendments which do not amend policy, to 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 \(accessible Word version\)](#)

The consultation response form should then be emailed to [CodeReviewResponses@food.gov.uk](mailto:CodeReviewResponses@food.gov.uk)

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# Details of consultation

## Introduction

In England, local authorities (LAs) and port health authorities (PHAs) 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 Secretary of State. 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 [Wales](#) and [Northern Ireland](#).

## 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 of the proposed developments for a modernised FHDM across [England](#), [Wales](#) and [Northern Ireland](#). As part of the consultation, we held nine 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 England and Northern Ireland. 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 establishment's 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 an 'appropriate 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 a prescriptive number of hours required for CPD
- 6) other amendments which do not amend policy, to 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 June 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](#) then 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 initial inspection can be delayed until operations have begun.

#### Proposed approach

It is proposed that clarification is provided as to how the information supplied by FBOs is used by CAs, and that a more risk-based approach is taken to the timescales for undertaking initial official food hygiene controls of new food business establishments, which aligns with the approach taken for food standards.

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. However, this approach would not apply to establishments subject to approval under assimilated [Regulation \(EC\) No 853/2004](#) or the requirements of assimilated [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.

This 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 an 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) and 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 an ‘appropriate 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 timescales 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	A physical inspection or audit (whether full or partial), except at: <ul style="list-style-type: none"> <li>• establishments which do not supply food directly to consumers</li> <li>• establishments which are not generally recognised by consumers as being food</li> </ul>



	<p>carried out, whichever is the sooner</p>	<p>businesses because the main business or activity is not food related</p> <ul style="list-style-type: none"> <li>• certain establishments operating from private addresses</li> </ul> <p>At these establishments Competent Authorities 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 undertaken physically or remotely, as long as they:</p> <ul style="list-style-type: none"> <li>• are effective and appropriate in the circumstances</li> <li>• verify compliance with relevant food law</li> <li>• enable validation of the desktop assessment</li> </ul>
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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 the approach taken to initial food standards controls.

It is also proposed that, in addition to amending the timescales for initial official controls, the methods and techniques of official controls that can be utilised are also amended.

This 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, as currently, undertake a physical inspection or audit (whether full or partial) at lower risk establishments which do not meet the criteria set out below. However, CAs would have the flexibility, at the following lower risk establishments, to use any of the methods and techniques of official control set out in article 14 of assimilated Regulation (EU) 2017/625, whether physical or remote:

- establishments which do not supply food directly to consumers
- establishment which are not generally be recognised by consumers as being a food businesses because the main business or activity is not food related
- certain establishments operating from private addresses

The types of establishments where wider methods and techniques of official control can be used are those which are either excluded or exempt from FHRS. Further guidance on these types of establishments is provided in the FHRS [Brand Standard](#).

The methods and techniques of official controls used at these establishments would need to be:

- effective and appropriate in the circumstances
- able to verify compliance
- able to validate the desktop assessment

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.

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**

<b>Business type</b>	<b>Current timescales and intervention type</b>	<b>Proposed timescales and intervention type</b>
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 was varied, but 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 clarifies 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 consistency in FHRS across the three nations.

The proposed approach would also 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, 44.6% of existing establishments in England have a potential hazard score of less than 29. These establishments would have fallen into the three-month timescale for an initial official control. Of these establishments, 99% 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, as outlined in proposal 3, officers not holding an 'appropriate qualification' for food hygiene, but who are competent, would be able to undertake the desktop assessment of new establishments and initial official controls of low risk 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 assimilated 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. However, 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 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, and it is made clear that, where effective and appropriate in the circumstances, official controls can be undertaken remotely. Table 3 compares the current flexibilities against those being proposed.

**Table 3: Comparison of current flexibilities against those being proposed**

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

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

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 relevant guidance, such as the [FHRS Brand Standard](#)
- 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 intervention rating

It is also proposed that, in certain circumstances, an establishment's 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 the following types of establishments, which are excluded or exempt from FHRs:

- establishments which do not supply food directly to consumers
- establishments which are not generally recognised by consumers as being food businesses because the main business or activity is not food related
- certain establishments operating from private addresses

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, but, as currently, the intervention rating would not be able to be revised. However, 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 of official controls could be used by CAs was proposed.

Feedback from the consultation was varied. While stakeholders did acknowledge that flexibility to use a wider range of method and techniques of official controls would be useful, and welcomed their introduction, there were concerns raised regarding their use to award an FHRs rating, particularly in Wales and NI where statutory schemes are in operation. There were also concerns that the flexibilities could only be used in limited circumstances, and that they may create inconsistencies between CAs.

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 terminology, and makes clear 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 consistency in FHRs across the three nations, this would not apply to those establishments in scope of FHRs.

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, amend the risk rating of an establishment where these flexibilities have been used.



## **Proposal 3: Extending the activities that officers, who do not hold an ‘appropriate 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)
- shellfish environmental monitoring
- official food controls or certain tasks related to other official activities on products of animal origin at Border Control Posts (BCPs)

### **Proposed approach**

We propose extending the activities that officers who do not hold an ‘appropriate 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 an ‘appropriate 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 assimilated Regulation (EC) No 853/2004 or the requirements of assimilated 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, other than those operating at the level of primary production, 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 assimilated Regulation (EC) No 853/2004 or the requirements of assimilated 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 an appropriate 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 an appropriate qualification and who is competent to undertake the formal enforcement action. However, if competent, officers not holding an appropriate qualification could undertake informal action following official controls they have undertaken.

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

## Rationale for change

Officers not holding an 'appropriate qualification' are limited in the types of activities they can be authorised to undertake.

The activities these officers could undertake was expanded in 2021 to include shellfish environmental monitoring. However, feedback from some CAs was that the activities should be extended further and include official controls at low-risk establishments.

One of the proposed developments consulted on as part of the modernised FHDM was to extend the activities officers not holding an 'appropriate qualification' could, if competent, undertake, which included official controls at low-risk establishments. Feedback to this proposed development highlighted that some additional flexibility as to who can

undertake official controls was generally welcomed, with some CAs commenting that this should be introduced as soon as possible. However, some concerns were raised about the proposed development, which included: that officers should have a holistic skillset of competencies; inconsistencies in assessing officer competency; and the availability of relevant training.

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

The proposed approach will allow CAs to deploy a wider cohort of officers and enable more effective use of resources. For example, unitary authorities could choose to upskill and authorise their food standards and/or feed officers to undertake official food hygiene controls at low-risk establishments, which could, if appropriate, be undertaken at the same time as other regulatory activities. Similarly, CAs could authorise apprentices working towards a relevant apprenticeship, if competent, to undertake official control at low-risk establishments.

Based on data provided by CAs to the FSA for the year 2023-2024, there were 279 officers in relation to food hygiene and 177 officers in relation to food standards, employed by CAs who did not hold an appropriate qualification. This includes regulatory support officers and trainees working towards an appropriate qualification. These officers, if competent, could be authorised to undertake official controls and the other activities listed above. If all these officers were to be authorised, then it would mean an additional 15.5% of officers in relation to hygiene and 18% in relation to standards that could undertake official controls at lower risk establishments when compared to the number of officers holding an appropriate 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 whether to recruit officers who do not hold an appropriate qualification, and how to utilise them. It will also enable them to choose whether to extend the authorisations of existing officers who are competent.

To support CAs in determining whether officers are competent, the FSA provides a Competency Framework<sup>2</sup> 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.

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<sup>2</sup> The Competency Framework is currently being reviewed by a working group which includes local authority representation, and it is anticipated that it will be relaunched in the summer.

## **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 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 Code also provides 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.

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 is to 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 assimilated 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 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 assimilated 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 a prescriptive 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 [assimilated Regulation \(EU\) 2017/625](#), and 10 hours on other professional matters which support 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 an appropriate 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 an appropriate 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 prescribed. 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 expected that all officers will require some CPD in any given year.

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 provide clarity, improve consistency and keep pace with current practices

There have been some other changes to the Code and PG as detailed in Annexes A and B of this consultation package, not brought about by the changes listed above. None of these other changes amend policy, but CAs will need to familiarise themselves with these amendments. Examples of other changes made to the Code and PG 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
- 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 Brand Standard to the PG
- adding the [Trading Standards Professional Apprenticeship](#), depending on the modules completed, as an appropriate qualification for food standards and food hygiene at the level of primary production. This qualification was [endorsed](#) by the FSA in May 2023 and will widen the cohort of professionals that can undertake

official food standards controls, and controls at the level of primary production. As of December 2024, there were 100 apprentices undertaking this apprenticeship.

- adding the following qualifications to the list of appropriate 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
- Adding the CTSI [Professional Competency in Feed](#) as an appropriate qualification for food hygiene at the level of primary production
- 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 has been reviewed.
- removing 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 details the provisions that have moved from the Code to the PG and vice versa.



# Impacts

## Costs

### Costs to local authorities

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 changes to the Code, namely the amendments to the FHDM, other policy changes, such as the approach to CPD, and amendments which provide clarity and consistency that 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 Practice Guidance, 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 18,737 words), by the average number of words a person can read per minute. For the amended sections of the Code and Practice Guidance 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 1.91 hours<sup>3</sup>.

In England, there are 318 local authorities, and 2,781 qualified officers engaged in delivering food hygiene and standards controls<sup>4</sup>.

We assume that one officer engaged in delivery food hygiene controls and/or one officer engaged in delivering food standards controls per CA will need to familiarise themselves with the changes. It is assumed that this officer will be a lead food officer.

In England, 21 County Councils are responsible for food standards only, 164 District Councils for food hygiene only, and 133 LAs are responsible for both. Therefore, we anticipate that 297 hygiene officers and 154 standards officers, will read and familiarise themselves with the new changes. It is also assumed that these officers would spend two

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<sup>3</sup> This familiarisation time relates to the economic impacts and will differentiate from the familiarisation time related to the CAs New Burdens impacts.

<sup>4</sup> Data based on End of Year Survey 2023/24 received by CAs.

hours to prepare and disseminate the information to other officers, via the appropriate channels.

For Unitary Councils, London Boroughs and Metropolitan Borough Councils the number of officers represents an overestimation as we have assumed a hygiene officer and a standards officer from each of the 133 LAs will familiarise themselves with the changes, and cascade to other officers. However, some LAs, depending on how their food teams are organised and structured, may only have one officer familiarise themselves with the changes.

We also assume that one manager at each of the 20 PHAs<sup>5</sup> in England will spend 1.91 hours<sup>6</sup> familiarising themselves with the changes and spend two hours disseminating this information to other officers via the appropriate channels.

It is then assumed that all other 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.

Based on data provided by CAs to the FSA for the year 2023-2024, there are 1,797 officers undertaking hygiene controls and 984 undertaking standards controls.

One caveat is that there might be 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.<sup>7</sup>

Based on research conducted internally in the FSA on the number of PHA staff, there are 133 PHA officers undertaking hygiene and standards controls. However, the data is slightly outdated as the research was completed in 2020.

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, £26.67 for a food hygiene officer, and £20.59 for a food standards officer (including a 22% uplift for overheads<sup>8</sup>). For the PHAs we used the same wages for lead officers.

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<sup>5</sup> Data based on details from Animal and Plant Health Agency [website](#).

<sup>6</sup> This familiarisation time relates to the economic impacts and will differentiate from the familiarisation time related to the CAs New Burdens impacts.

<sup>7</sup> The FSA Local Authority Monitoring Team has completed data accuracy checks, and any additional corrections will be updated in the analysis.

<sup>8</sup> Uplift based on Regulatory Policy Committee [guidance](#).

Multiplying the time spent on familiarisation, the number of food standards, food hygiene and PHA officers in England and their respective wages generates a total cost of familiarisation of £180,077.

### **Local authority officer training costs**

We anticipate that one lead food hygiene officer and/or one lead food standards officer per LA, and one manager per PHA would attend remote training to understand the proposed changes and to ensure consistent implementation. Therefore, we assume that 297 lead officers undertaking food hygiene controls, 154 lead officers undertaking food standards controls and 20 PHA managers, totalling 471 officers will spend approximately 1.25 hours 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.

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 £19,077.

### **Updating procedures costs**

As the proposals clarify how CAs manage and deliver interventions, CAs may 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 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 England was just over 2.5 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 also not anticipated to have an impact on businesses, as CAs already have flexibility to determine the type of intervention to undertake at low-risk establishments.

## **Benefits**

### **Benefits to local authorities**

#### **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 proposed flexibilities, if utilised, could assist CAs in reducing their backlog of official controls at lower risk establishments.

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 all establishments are subject to initial official controls within appropriate timescales. Additionally, officers not holding an 'appropriate qualification' for food hygiene and/or food standards, but who are competent, could undertake the desktop assessment of new food business establishments.

Similarly, the proposal to extend the activities that officers not holding an 'appropriate 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 to the FSA for the year 2023-2024, there were 279 officers in relation to food hygiene and 177 officers in relation to food standards, employed by CAs who did not hold an appropriate 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<sup>9</sup>, 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 appropriate qualifications for food hygiene, food standards and primary production will 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 and public health**

### **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. Thus, potentially more non-compliances are expected to be identified faster than currently. This means that consumers will benefit from enhanced consumer protection through more efficient allocation of resources. This, in turn would foster greater public health..

## **Engagement and Consultation Process**

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

Work to modernise the FHDM in England, Wales and Northern Ireland commenced in September 2021. We established an LA/FSA Working Group to provide a mechanism for

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<sup>9</sup> Time and travel savings will be calculated for Local Authorities in England with Food Hygiene function, as per relevant feedback received on the Food Standards model. In calculating these benefits, data from the Food Standards Model, collected through the food standards pilot, will be used.

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 [England](#), [Wales](#) and [Northern Ireland](#).

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 asked in this consultation 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 requires 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 flexibilities as to who can undertake official controls and other official activities:
  - 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 category E establishments, do you consider that the proposed approach will provide clarity and consistency in the frequency of official controls at these establishments? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).
5. In relation to proposal 5, the changes to the amount of training and CPD that officers undertake on an annual basis, do you consider that the approach will provide CAs with greater flexibility to determine appropriate levels of CPD and training that officers undertake? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).
6. In relation to proposal 6 - other amendments which 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 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)
  - c) do you consider that moving the guidance on parts two and three of the food hygiene intervention rating scheme from the FHRS Brand Standard to the PG will improve clarity as to where the guidance can be found? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why)
  - d) do you have any objections to the inclusion of the following qualifications within the Code:
    - Trading Standards Professional Apprenticeship with the food module as an appropriate qualification for food standards
    - Trading Standards Professional Apprenticeship with the animal feed module as an appropriate qualification for food hygiene at the level of primary production
    - Degree in Environmental Health awarded by the Dublin Institute of Technology (awarded from June 2012 onwards)



- Degree in Environmental Health awarded by the Technological University Dublin

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

- e) 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)
- f) 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)
- g) 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)

**7. 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

This section 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 'appropriate' 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 from this consultation, that further stakeholder engagement and consultation will be undertaken to inform any final decision.

### Current approach

Assimilated Regulation (EU) 2017/625 requires CAs to have access to a sufficient number of suitably qualified and experienced officers. The 'suitable qualification' requirement is defined in the Code as statutory guidance and provides a list of 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 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.

The Feed Law Code of Practice requires that officers involved in the assessment of compliance with feed law hold an 'appropriate qualification'. The Feed Law Code of Practice signposts CAs to the list of 'appropriate qualifications' in the Feed Law Practice Guidance.

### 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 as statutory guidance (in the Code) that officers should hold an appropriate qualification. The Code would also outline that there would be published governance procedures (further outlined below) for how this process would be managed. The list of endorsed qualifications would then be 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.

For the past few months, FSA officials have been collaborating with a three nation LA working group and other stakeholders to co-develop governance procedures for how existing and future qualifications will be considered, assessed and endorsed by the FSA. The draft procedures will 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 'appropriate' 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 where they are published.

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 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.

271 officers across England, Northern Ireland and Wales attended the events. The majority (85%) endorsed the option “To retain suitable/appropriate qualifications and to introduce additional governance and flexibilities so new qualifications can be appropriately considered and that all qualifications are routinely reviewed for fitness for purpose.”

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 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 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 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 and seeking Ministerial approval for the changes to the Code. This is a resource intensive and lengthy process. The Minister does not scrutinise specific qualifications and relies on the FSA to advise them of their suitability.

To manage FSA resources, we often 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 also mean that an appropriate 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. The option being considered would propose that if the qualification governance panel were satisfied that a qualification should be endorsed, that the PG would be updated to reflect a revised list of qualifications. This would therefore allow a more expedient update of the list. 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 food profession and becomes a barrier to addressing the shortage of qualified food officers and recruitment challenges faced by some LAs.

### Questions in relation to future potential developments - Qualifications:

1. Do you consider that moving the list of FSA endorsed qualifications to the PG could provide flexibility to recognise new qualifications more expediently without reducing the professional standards subject to an agreed and published governance procedure being in place? If not, please provide your reasons and evidence of the impact you think this will have.
2. What do you perceive to be the advantages, disadvantages and impacts if we move the list of qualifications from the Code to the PG?
3. 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 \(England\)](#).
- [Draft Food Law Practice Guidance \(England\)](#)

## 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 \(accessible Word version\)](#)

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](mailto: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](mailto: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,

Fiona McClements

Head of the Official Food and Feed Controls Frameworks Team

## 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 references to 'retained EU law' amended to 'assimilated law'.
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 2.3.1.1	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 2.3.1.2	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 2.3.1.3	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	Provisions relating to designation of CAs for food moved to section 2.5.2 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.
COP 14	Section 2.6.4	Section 2.5.4.4	Terminology amended. Provisions relating to regional and local liaison groups moved to section 2.5.5 of the draft PG.
COP 15	Section 2.6.5	Section 2.5.3	Terminology amended.
COP 16	Section 2.6.6.1	Section 2.5.4.1	Terminology amended. Exception for contamination found in establishments at level of primary production removed.
COP 17	Section 2.6.6.2	Section 2.5.4.2	Terminology amended. Exception for contamination found in establishments at level of primary production removed and clarification of when chemical contamination should be investigated by County Councils added.
COP 18	Section 2.6.6.3	Section 2.5.4.3	Terminology amended.



Reference	Current Code	Draft Code	Record of change to the Code
COP 19	Section 2.7 Section 2.7.2 Section 2.8	N/A	Provisions relating to Primary Authority, Home Authority and provision of discretionary services moved to sections 2.8, 2.8.1, 2.8.2 and 2.9 of the draft PG.
COP 20	Section 2.9	Section 2.6.1	Terminology amended. Reference to Framework Agreement removed in line with proposal 6.
COP 21	Section 2.10	Section 2.6	Terminology amended. Provision relating to providing officers with equipment necessary to enable them to carry out full range of controls moved from section 2.10 of the current PG.
COP 22	Section 2.11	Section 2.5.2.1	Terminology amended.
COP 23	Section 2.12.1	N/A	Provisions relating to registration and approval requirements moved to section 2.6.2 of draft Code.
COP 24	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 25	N/A	Section 2.6.3	Terminology amended. Provision relating to information to record about each food business establishment moved from section 2.14.3 of the current PG.
COP 26	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 2.6.1.1 of the draft PG.
COP 27	Section 2.12.2.2	Section 2.6.5.1	Terminology amended. Provision relating to maintaining an up-to-date list of approved establishments moved to section 2.6.2 of the draft Code.

Reference	Current Code	Draft Code	Record of change to the Code
COP 28	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 2.3.1.1 of the draft Code.
COP 29	Section 2.13.2	Section 2.7.2	Terminology amended.
COP 30	Section 2.13.3	Section 2.7.3	Terminology amended. Reference to the Framework Agreement removed in line with proposal 6.
COP 31	Section 2.13.4	N/A	Provisions relating to refusal of approval moved to section 2.7.3 of the draft Code.
COP 32	Section 2.13.5	N/A	Provisions relating to change of activities and ownership removed as duplicated details in approval guidance.
COP 33	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 34	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 2.6.2 of the draft PG.
COP 35	Section 3.1	Section 3.1	Amended to reflect content of chapter, and Competency Framework transition period removed.
COP 36	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 2.4.1 and 2.4.2 of the draft PG.

Reference	Current Code	Draft Code	Record of change to the Code
COP 37	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 38	Section 3.3	N/A	Section heading removed.
COP 39	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 40	Section 3.3.2	Section 3.2.2	Terminology amended. Provisions relating to authorisation being in writing moved to section 3.3.1 of the draft Code. Provisions relating to officer competency moved to section 3.2.4 of the draft Code.
COP 41	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'.
COP 42	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 43	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 44	Section 3.4	Section 3.2.3	Section heading amended. Provisions relating to the activities that officers not holding an appropriate 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 45	Section 3.4.1	Section 3.2.3.1	Terminology amended. Provisions relating to qualifications with restrictions moved to section 3.2.3.4 of draft Code. Footnote removed. Degree in Environmental Health awarded by Dublin Institute of Technology (awarded from June 2012 onwards) and

Reference	Current Code	Draft Code	Record of change to the Code
			Degree in Environmental Health awarded by Technological University Dublin included in the list of appropriate qualifications for food hygiene.
COP 46	N/A	Section 3.2.3.4	Provisions relating to qualifications with restrictions moved from section 3.4.1 of current Code.
COP 47	Section 3.4.2	Section 3.2.3.2	Terminology amended. Provisions relating to restricted qualifications moved to section 3.2.3.4 of draft Code. Footnote removed. Provisions relating to quality assurance systems removed, as covered by Competency Framework. The following included as appropriate qualification for food standards: <ul style="list-style-type: none"> <li>• Trading Standards Professional apprenticeship, with the food standards module</li> <li>• Degree in Environmental Health awarded by Dublin Institute of Technology (awarded from June 2012 onwards)</li> <li>• Degree in Environmental Health awarded by Technological University Dublin</li> </ul>
COP 48	Section 3.4.3	Section 3.2.3.3	Terminology amended. Footnote removed. Additional qualifications added, the Trading Standards Professional apprenticeship, with the feed module and the CTSI Professional Competency in Feed.
COP 49	Section 3.4.4	Section 3.2.3.5	Terminology amended. Guidance on relevant professional awarding bodies moved to section 3.2.3.4 of the draft PG.
COP 50	N/A	Section 3.2.3.6	New section added relating to notification of new qualifications.
COP 51	Section 3.5	Section 3.4	Section heading amended.
COP 52	N/A	Section 3.4.1	New section heading added.

Reference	Current Code	Draft Code	Record of change to the Code
COP 53	Section 3.5.1	Section 3.4.1.1	Terminology amended. Provisions relating to The Trade in Animals and Related Products Regulations moved to section 3.4.1 of the draft PG. Clarification added around officer competency.
COP 54	Section 3.5.2	Section 3.4.1.2	Terminology amended. Clarification added around officer competency.
COP 55	Section 3.5.3	Section 3.4.1.3	Terminology amended. Clarification added around officer competency. Provision relating to training programme moved to section 3.4.3 of the draft Code.
COP 56	Section 3.5.4	Section 3.4.1.4	Terminology amended.
COP 57	Section 3.6	Section 3.4.2	Terminology amended.
COP 58	Section 3.7	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 3.4.1 of the current PG. Reference to Competency Framework moved to section 3.2.4 of draft PG.
COP 59	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 60	Section 3.8	N/A	Section heading removed.
COP 61	Section 3.9	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.

Reference	Current Code	Draft Code	Record of change to the Code
COP 62	Section 3.9.1	Section 3.4.3	Terminology amended. Provision relating to competency moved to section 3.3 of draft Code. Provisions relating to training programme moved from section 3.5.2 of the current PG.
COP 63	Section 4.1	Section 4.1	Terminology amended. Footnote removed.
COP 64	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 65	Section 4.2.1	N/A	Provisions relating to prior notification incorporated into section 4.4 of draft Code.
COP 66	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 2.8.1 of the PG.
COP 67	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 68	Section 4.2.4	Section 4.2.4	Terminology and section heading amended. Clarification of establishments not covered by this section added.
COP 69	N/A	Section 4.2.4.1	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 70	Section 4.2.4.1	Section 4.2.4.2	Terminology amended. Approach to initial official controls amended to reflect proposed policy changes detailed in proposal 1.

Reference	Current Code	Draft Code	Record of change to the Code
COP 71	Section 4.2.4.2	Section 4.2.4.3	Terminology amended. Provisions relating to desktop assessment moved to section 4.2.4.1 of draft Code. Examples of prioritisation moved to section 4.2.4.2 of the draft PG.
COP 72	N/A	Section 4.2	Provisions relating to frequency of official controls moved from section 4.2 of the current Code. Terminology amended.
COP 73	Section 4.3	N/A	Section heading removed.
COP 74	Section 4.3.1	Section 4.2.5	Terminology amended. Provisions relating to information or intelligence suggesting the nature of a business's activities has changed moved from sections 4.3.2.1 and 4.3.2.2 of current Code. Provisions relating to using full range of scores and consideration of information supplied by others moved to section 4.2.6 of the draft Code.
COP 75	Section 4.3.2	Section 4.2.6	Provisions relating to consideration of information supplied by others moved from section 4.3.1. Provisions relating to gathering of information, using full range of scores and recording justification for revising a rating moved from sections 4.3.2.1 and 4.3.2.2 of current Code. Terminology amended.
COP 76	Section 4.3.2.1	4.2.6.1	Provisions relating to revision of intervention ratings amended to reflect proposed policy changes detailed in proposal 1. Provisions relating to gathering of information, using full range of scores and recording justification for revising a rating moved to section 4.2.6.
COP 77	Section 4.3.2.2	4.2.6.2	Terminology amended. Provisions relating to gathering of information, using full range of scores and recording justification for revising a rating moved to section 4.2.6.

Reference	Current Code	Draft Code	Record of change to the Code
COP 78	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 79	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.
COP 80	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 81	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 82	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 83	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 84	Section 4.4.3	Section 4.2.3	Terminology amended. Examples of information and intelligence removed as duplicated details in primary production guidance.
COP 85	Section 4.5	N/A	Provisions relating to sampling moved to section 4.3.3 of the draft PG.
COP 86	N/A	Section 4.3.3 Section 4.3.3.1 Section 4.3.3.2	Provisions related to sampling moved from section 4.6 and relevant sub-sections of the current PG.



Reference	Current Code	Draft Code	Record of change to the Code
		Section 4.3.3.3	
COP 87	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.
COP 88	N/A	Section 4.5	Provisions relating to non-official controls moved from section 4.2.7 of the current PG.
COP 89	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 90	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 91	N/A	Section 4.7.1	Provisions relating to imported food procedures moved from section 4.5 of the current PG.
COP 92	Section 4.6.3	Section 4.7.2	No change.
COP 93	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 94	Section 4.6.3.2	Section 4.7.2.2	Terminology amended. Provisions relating to risk based planned arrangements moved from section 4.9 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 95	Section 4.6.3.3	Section 4.7.2.3	Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 96	Section 4.6.4	Section 4.7.3	Terminology amended.
COP 97	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.
COP 98	N/A	Section 4.7.4	Provisions relating to liaison/referrals moved from section 4.5.6 of the current PG. Terminology amended.
COP 99	Section 5.1	Section 5.1	No change.
COP 100	Section 5.2	Section 5.2	No change.
COP 101	Section 5.2.1	Section 5.2.1	Terminology amended.
COP 102	Section 5.2.2	Section 5.2.2	Terminology amended.
COP 103	Section 5.3	Section 5.3	No change.
COP 104	Section 5.3.1	Section 5.3.1	No change.
COP 105	Section 5.3.2	Section 5.3.2	No change.
COP 106	Section 5.3.3	Section 5.3.4	No change.
COP 107	Section 5.3.3.1	Section 5.3.4.1	Terminology amended.
COP 108	N/A	Section 5.3.5	Provisions relating to root cause analysis moved from 5.2.5 of PG. Terminology amended.
COP 109	Section 5.3.4	Section 5.3.6	Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 110	Section 5.3.5	Section 5.3.7	Terminology amended.
COP 111	Section 5.3.6	Section 5.3.8	Terminology amended.
COP 112	Section 5.3.7	Section 5.3.9	Terminology amended.
COP 113	Section 5.4	Section 5.4	No change.
COP 114	Section 5.4.1	Section 5.4.1	Terminology amended.
COP 115	Section 5.4.2	Section 5.4.2	Terminology amended.
COP 116	Section 5.4.3	Section 5.4.3	Terminology amended.
COP 117	Section 5.4.4	Section 5.4.4	Terminology amended.
COP 118	Section 5.5	N/A	Section heading removed.
COP 119	Section 5.5.1	N/A	Provisions relating to the role of the National Food Crime Unit (NFCU) moved to section 5.4 of the draft PG.
COP 120	Section 5.5.2	N/A	Provisions relating to fraud and food crime removed as duplicated guidance on the FSA website in relation to the NFCU.
COP 121	Section 5.5.3	Section 5.7	Terminology amended.
COP 122	Section 5.6	Section 5.5	No change.
COP 123	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 124	Section 5.6.2	Section 5.5.1	Reference to the PG removed in line with proposal 6.

Reference	Current Code	Draft Code	Record of change to the Code
COP 125	Section 5.6.3	Section 5.5.2	Terminology amended. Provisions relating to communications with countries outside the UK moved from section 5.4.4 of current PG.
COP 126	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 127	Section 5.6.5	Section 5.5.3	No change.
COP 128	Section 5.7	Section 5.6	Terminology amended.
COP 129	Section 6.1	Section 6.1	Terminology amended.
COP 130	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, the Regulators' Code and the Code for Crown 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 131	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 132	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 133	Section 6.4	Section 6.3	Title amended.
COP 134	Section 6.4.1	Section 6.3.1	Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 135	Section 6.4.2	Section 6.3.2	Terminology amended. Provisions relating to Primary Authority and 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 136	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.
COP 137	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 138	N/A	Section 6.4	New section to provide information regarding taking of formal action and service of notice. 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 139	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 140	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 141	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 142	Section 6.5.2.1	Section 6.4.1.2	Title amended. Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 143	Section 6.5.2.2	Section 6.4.1.3	Title amended. Terminology amended.
COP 144	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 6.6.13 of current PG. Terminology amended.
COP 145	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.
COP 146	Section 7.1	Section 7.1	Terminology amended.
COP 147	N/A	Section 7.2	New section to provide information relating to registration of shellfish gatherers.
COP 148	Section 7.2	Section 7.4	Title amended. Terminology amended. Provision relating to membership of liaison group moved to the section 7.4 of draft PG.
COP 149	Section 7.3	Section 7.5	Title amended.
COP 150	Section 7.3.1	Section 7.5.1	Title amended. Terminology amended. Provisions relating to registration documents and the FBO requirement to keep copies of registration documents moved to section 7.5.1 of draft PG. Provisions relating to contacting other Competent Authorities moved to section 7.5.3 of draft Code and PG. Provisions relating to checking registration documents moved to section 7.5.3 of draft Code.
COP 151	Section 7.3.2	Section 7.5.2	Title amended. Terminology amended.
COP 152	Section 7.3.3	Section 7.5.3	Terminology amended. Provisions relating to checking registration documents and contacting other Competent authorities moved from section 7.3.1 of the current Code.

Reference	Current Code	Draft Code	Record of change to the Code
COP 153	Section 7.3.4	N/A	Provisions relating to approvals of purification centres removed as duplicated guidance available in other FSA approvals guidance.
COP 154	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 155	Section 7.4	Section 7.3	Provisions relating to production and relaying areas moved to section 7.3.1 of the draft Code. Terminology amended.
COP 156	Section 7.4.1	Section 7.3.1	Title amended. Terminology amended. Provisions relating to production and relaying areas moved from section 7.4 of current Code. Reference to sampling plan and sanitary survey added. Provisions relating to Pectinidae (scallops) and non - filter feeding gastropods harvested from outside classified production areas moved from section 7.1.3 of the current PG.
COP 157	Section 7.4.2	Section 7.8	Terminology amended.
COP 158	Section 7.5	Section 7.6	Title amended. Terminology amended. Provisions relating to liaising with the FSA and use of Closure Notices moved to section 7.6.1 of the draft Code. Provisions relating to notifying and display of closure notices moved to Section 7.6.1 of PG.
COP 159	N/A	Section 7.6.1	New section to provide information relating to liaison arrangements following non-compliant official control sampling. Provisions relating to liaising with the FSA and use of Closure Notices moved from section 7.5 of current Code. Terminology amended.
COP 160	N/A	Section 7.7	New section to provide information relating to live bivalve molluscs and other shellfish which fail to satisfy requirements moved. These provisions have been moved from section 7.1.14 of current PG. Terminology amended.

Reference	Current Code	Draft Code	Record of change to the Code
COP 161	Annex 1	Annex 1	Terminology amended.
COP 162	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. References to EU Withdrawal Act removed and replaced with references to assimilated law.
PG 2	Section 2.1	Section 2.1	Terminology amended.
PG 3	Section 2.2	Section 2.2.1	Terminology amended. Provisions listing datasets removed as duplicated details on single data list.
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 2.3	Section heading title amended.
PG 6	Section 2.4.1	Section 2.3.5	Terminology amended. Additional provisions included in relation to arrangements for sharing food registration information and recording date information received.
PG 7	Section 2.4.2	Section 2.3.1	Terminology amended. Provisions relating to approvals procedure moved to section 2.3.1.1 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 2.3.1.1 of the draft Code.
PG 9	Section 2.4.4	Section 2.3.2	Terminology amended. Provisions relating to maintaining a control verification procedure, steps to address performance and

Reference	Current PG	Draft PG	Record of change to the PG
			demonstrating consistent application moved to section 2.3.1.1 of the draft Code.
PG 10	Section 2.4.4.1	Section 2.3.2.1	Terminology amended. Provisions relating to quantitative and qualitative monitoring and records of monitoring moved to section 2.3.1.1 of the Code.
PG 11	Section 2.4.4.2	Section 2.3.2.2	Terminology amended.
PG 12	Section 2.4.4.3	Section 2.3.2.3	Terminology amended. Provision relating to addressing non-compliances in a timely and effective manner moved to section 2.3.1.1 of the draft Code.
PG 13	Section 2.4.4.4	Section 2.3.2.4	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 2.3.1.1 of the draft Code.
PG 15	Section 2.4.6	Section 2.3.6	Terminology amended. Provisions relating to food incidents and alerts procedure moved to section 2.3.1.1 of the draft Code.
PG 16	Section 2.4.7	Section 2.3.7	Terminology amended.
PG 17	Section 2.4.8	Section 2.3.8	Terminology amended. Provisions relating to what a food complaints procedure should cover, referral arrangements, receipt of complaints and their investigation moved to section 2.3.1.1 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 18	Section 2.4.9	N/A	Provisions relating to sampling procedure moved to section 2.3.1.1 of the draft Code.
PG 19	Section 2.4.10	Section 2.3.9	Terminology amended. Provisions relating to identification of equipment and measures taken for unsatisfactory in-service checks of equipment moved to section 2.3.1.1 of the draft Code.
PG 20	Section 2.4.11	Section 2.3.12	Terminology amended.
PG 21	Section 2.4.12	Section 2.3.4	Provisions relating to official food controls procedure moved to section 2.3.1.1 of the draft Code.
PG 22	Section 2.4.13	Section 2.3.10	Terminology amended.
PG 23	Section 2.4.14	Section 2.3.3	Terminology amended.
PG 24	Section 2.4.15	Section 2.3.11	Terminology amended.
PG 25	N/A	Section 2.3.4	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 2.3.13	Terminology amended. Provisions relating to setting out general approach to food sampling, including unsatisfactory samples within the sampling policy moved to section 2.3.1.2 of the draft Code.
PG 28	Section 2.5.2	Section 2.3.14	Terminology amended. Provisions relating to approval of enforcement policies moved to section 2.3.1.2 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 29	Section 2.5.3	Section 2.3.15	Terminology amended. Provisions relating to approach to receiving complaints and what complaints policy covers moved to section 2.3.1.2 of the draft Code.
PG 30	Section 2.6	N/A	Section heading removed.
PG 31	Section 2.6.1	2.3.18	No change.
PG 32	Section 2.6.1.1	Section 2.3.18.1	Terminology amended.
PG 33	Section 2.6.1.2	Section 2.3.18.2	Terminology amended. Provisions relating to period service plan covers, and its approval, moved to section 2.3.1.3 of the draft Code. Provisions relating to development of the service plan moved to section 2.3.18.3 of the draft PG.
PG 34	N/A	Section 2.3.18.3	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 2.3.16	Terminology amended.
PG 37	Section 2.7	N/A	Section heading removed.
PG 38	Section 2.7.1	Section 2.3.19	Terminology amended. Provisions relating to departure from Code removed to align with approach taken in Code.
PG 39	Section 2.7.2	Section 2.3.20	Terminology amended. Provisions relating to what a sampling programme should consider moved to section 2.3.1.3 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 40	Section 2.7.3	Section 2.3.17	Terminology amended. Additional point on training programmes being informed by officer competency assessments included.
PG 41	Section 2.7.4	NA	Provisions removed in line with proposal 4.
PG 42	NA	Section 2.4	Provision relating to delegation of official controls moved from section 3.2 of the current Code.
PG 43	NA	Section 2.4.1	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	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 2.5	No change.
PG 46	Section 2.8.1	Section 2.5.1	Terminology amended.
PG 47	N/A	Section 2.5.2	Provisions relating to liaison with FSA moved from section 2.6.2 of the current Code.
PG 48	Section 2.8.2	Section 2.5.3	Terminology amended.
PG 49	Section 2.8.3	Section 2.5.4	No change.
PG 50	Section 2.8.3.1	Section 2.5.4.1	Terminology amended.
PG 51	N/A	Section 2.5.5	Provisions relating to regional and local liaison groups moved from section 2.6.4 of the current Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 52	Section 2.9	Section 2.8	Section heading title amended.
PG 53	Section 2.9.1	Section 2.8.1	Terminology amended. Provisions relating to the Primary Authority Scheme removed from PG as duplicated details in Primary Authority guidance provided by the Office for Product Safety and Standards (OPSS). Links to this guidance provided. Provisions relating to the FSA being a supporting regulator moved from section 2.9.5 of the current PG.
PG 54	N/A	Section 2.8.2	Provisions relating to home authority moved from section 2.7.2 of the current Code. Terminology amended.
PG 55	Section 2.9.2	N/A	Provisions relating to identifying businesses in the Primary Authority scheme removed from PG as duplicated details in Primary Authority guidance provided by OPSS. Links to this guidance provided.
PG 56	Section 2.9.3	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 57	Section 2.9.4	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 58	Section 2.9.5	N/A	Provisions relating to the FSA being a supporting regulator moved to section 2.8.1 of the draft PG.

Reference	Current PG	Draft PG	Record of change to the PG
PG 59	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 60	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 61	Section 2.12	Annex 2	Section heading title amended.
PG 62	Section 2.12.1	N/A	Provisions moved to the glossary in the draft Code.
PG 63	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 64	Section 2.12.3	A2.1.2	Terminology amended.
PG 65	Section 2.12.4	A2.1.3	Terminology amended.
PG 66	Section 2.12.5	A2.1.4	No change.
PG 67	Section 2.12.5.1	A2.1.5	Terminology amended.
PG 68	Section 2.12.5.2	A2.1.6	Terminology amended.
PG 69	Section 2.12.5.3	A2.1.7	Terminology amended.
PG 70	Section 2.12.6	A2.2	No change.
PG 71	Section 2.12.6.1	A2.2.1	Terminology amended.
PG 72	Section 2.12.6.2	A2.2.2	No change.

Reference	Current PG	Draft PG	Record of change to the PG
PG 73	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 74	Section 2.12.6.4	A2.2.4	Terminology amended.
PG 75	Section 2.12.7	A2.2.5	Terminology amended.
PG 76	Section 2.12.8	A2.2.6	Terminology amended.
PG 77	Section 2.12.9	A2.2.7	Terminology amended.
PG 78	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.
PG 79	Section 2.12.11	A2.3	No change.
PG 80	Section 2.12.11.1	A2.3.1	Terminology amended. Provisions relating to approved establishments removed as duplicated guidance in the approval of establishments guidance.
PG 81	Section 2.12.11.2	A2.3.2	Terminology amended.
PG 82	Section 2.12.11.3	A2.3.3	Terminology amended.
PG 83	Section 2.12.11.4	A2.3.4	Terminology amended.
PG 84	Section 2.12.12	A2.4	No change.
PG 85	Section 2.12.12.1	A2.4.1	Terminology amended.



Reference	Current PG	Draft PG	Record of change to the PG
PG 86	Section 2.12.12.2	A2.4.2	Terminology amended.
PG 87	Section 2.12.12.3	A2.4.3	Terminology amended.
PG 88	Section 2.12.12.4	A2.4.4	Terminology amended.
PG 89	Section 2.12.13	A2.5	Terminology amended.
PG 90	Section 2.12.13.1	A2.5.1	Terminology amended.
PG 91	Section 2.12.13.2	A2.5.2	Terminology amended.
PG 92	Section 2.12.13.3	A2.5.3	Terminology amended.
PG 93	Section 2.12.13.4	A2.5.4	Section heading title amended. Terminology amended.
PG 94	Section 2.12.13.5	A2.5.5	Terminology amended.
PG 95	Section 2.12.13.6	A2.5.6	Terminology amended.
PG 96	Section 2.12.13.7	A2.5.7	Provisions relating to sources of information on mobile food establishments removed from PG as duplicated other guidance.
PG 97	Section 2.12.13.8	A2.5.7	Terminology amended.
PG 98	Section 2.12.14	A2.6	No change
PG 99	Section 2.12.14.1	A2.6.1	Terminology amended.
PG 100	Section 2.12.14.2	A2.6.2	Terminology amended. Link to guidance removed.
PG 101	Section 2.12.14.3	A2.6.3	Terminology amended. Link to guidance removed.

Reference	Current PG	Draft PG	Record of change to the PG
PG 102	Section 2.12.14.4	A2.6.4	Terminology amended.
PG 103	Section 2.12.14.5	A2.6.5	Terminology amended.
PG 104	Section 2.12.14.6	A2.6.6	Terminology amended.
PG 105	Section 2.12.14.7	A2.6.7	Terminology amended.
PG 106	Section 2.12.14.8	A2.6.8	Terminology amended.
PG 107	Section 2.13	Section 2.7	Provision added with link to approvals guidance.
PG 108	Section 2.13.1	N/A	Provisions relating to division of responsibilities between local authorities and FSA removed as duplicated guidance in the approval of establishments guidance.
PG 109	Section 2.13.2	N/A	Provisions relating to exemptions from approval removed as duplicated guidance in the approval of establishments guidance.
PG 110	Section 2.13.3	Section 2.7.1	Terminology amended.
PG 111	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.
PG 112	Section 2.13.5	N/A	Provisions relating to determination of approval removed as duplicated guidance in the approval of establishments guidance.
PG 113	Section 2.13.6	N/A	Provisions relating to conditional approval removed as duplicated guidance in the approval of establishments guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 114	Section 2.13.7	N/A	Provisions relating to appeals removed as duplicated guidance in the approval of establishments guidance.
PG 115	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 116	Section 2.13.9	N/A	Provisions relating to notification of approval status removed as duplicated guidance in the approval of establishments guidance.
PG 117	Section 2.13.10	Section 2.7.2	Terminology amended.
PG 118	Section 2.13.11	N/A	Provisions relating to identification marks removed as duplicated guidance in the approval of establishments guidance.
PG 119	Section 2.13.12	N/A	Provisions relating to template forms removed as duplicated guidance in the approval of establishments guidance.
PG 120	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 2.7 of the draft PG.
PG 121	Section 2.14	N/A	Section heading removed.
PG 122	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 123	Section 2.14.2	Section 2.6.1	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 124	Section 2.14.3	Section 2.6.2	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 125	N/A	Section 2.6.3	Provisions relating to retention of records moved from section 2.14 of the current Code.
PG 126	Section 2.14.3.1	Section 2.6.3.1	Terminology amended. Link to guidance removed.
PG 127	Section 2.15	Section 2.5.2.1	Terminology amended.
PG 128	N/A	Section 2.9	Provision relating to the provision of discretionary services moved from section 2.8 of the current Code. Terminology amended.
PG 129	Section 3.1	Section 3.1	Terminology amended.
PG 130	Section 3.2	N/A	Section heading removed.
PG 131	Section 3.2.1	Section 3.2	Terminology amended.
PG 132	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 133	Section 3.2.3	N/A	Provisions relating to authorisation procedure moved to section 2.3.1.1 of the draft Code.
PG 134	Section 3.2.4	Section 3.2.2	Provisions relating to authorisation procedure moved to sections 3.2.2.1 and 3.2.2.3 of the draft PG. Title of section heading amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 135	N/A	Section 3.2.2.1	New section on guidance relating to appropriate supervision of officers.
PG 136	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 137	Section 3.3	N/A	Section heading removed.
PG 138	Section 3.3.1	N/A	Section heading removed.
PG 139	Section 3.3.1.1	Section 3.2.3.2	Terminology amended and tables merged to avoid duplication.
PG 140	Section 3.3.1.2	Section 3.2.3.3	Terminology amended. Provisions relating to competency moved from section 3.4.4 of the current PG.
PG 141	Section 3.3.2	Section 3.2.3.4	Terminology amended. Provisions relating to awarding bodies and non-UK qualifications moved from section 3.4.4 of the current Code.
PG 142	N/A	Section 3.2.3.1	New section added to provide reference back to Code in relation to qualifications with restrictions.
PG 143	Section 3.4	N/A	Section heading removed.
PG 144	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 PG. Provisions relating to the Competency Framework removed, as duplicated guidance in the Competency Framework.
PG 145	Section 3.4.2	Section 3.2.4.2	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 146	Section 3.4.3	Section 3.2.3	Terminology amended. Additional activities included to align with proposal 3.
PG 147	Section 3.4.4	N/A	Provisions relating to allergen information moved to section 3.2.3.3 of the draft PG.
PG 148	Section 3.4.5	Section 3.4	Terminology amended.
PG 149	Section 3.4.6	Section 3.2.4.1	Provision relating to assessing officer competency moved from to section 3.2.4.1 of the draft Code. Provisions relating to evidence of competency moved from section 3.4.7 of current PG. Terminology amended.
PG 150	Section 3.4.7	N/A	Section removed as provisions relating to evidence of competency moved to section 3.2.4.1 of the draft PG.
PG 151	Section 3.4.8	Section 3.2.4.3	Terminology amended. Provision relating to competency assessment removed as duplicated provisions in section 3.2.4 of the draft Code.
PG 152	Section 3.5	N/A	Section heading removed.
PG 153	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 2.3.17 of the draft PG.
PG 154	Section 3.5.2	N/A	Section removed as provisions relating to training programme moved to section 3.4.3 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 155	N/A	Section 3.4.1	New section. Provisions relating to official fish inspections moved from section 3.5.1 of the current Code.
PG 156	Section 3.6	N/A	Section heading removed.
PG 157	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 158	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 159	Section 3.6.3	Section 3.3.1.2	Terminology amended.
PG 160	Section 3.6.4	Section 3.3.1.3	Terminology amended.
PG 161	Section 4.1	Section 4.1	Terminology amended.
PG 162	N/A	Section 4.2	New section heading.
PG 163	Section 4.2	Section 4.2.1	Provision relating to choosing interventions moved to section 4.3 of the draft Code. Terminology amended.
PG 164	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 165	N/A	Section 4.2.2.1	New section providing guidance on use of vulnerable risk group score.
PG 166	N/A	Section 4.2.3	New section, providing link to primary production guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 167	N/A	Section 4.3	New section, provisions relating to using other methods and techniques moved from section 4.4.1.1 of the current Code.
PG 168	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 169	N/A	Section 4.3.2	New section, providing guidance on use of remote methods and techniques.
PG 170	N/A	Section 4.3.2.1	New section, providing guidance on use of questionnaires.
PG 171	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, 4.3.4.5 and 4.6.2 of the draft PG.
PG 172	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 173	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 174	Section 4.2.4	N/A	Provisions relating to verification removed from PG as duplicated details in data returns guidance.
PG 175	Section 4.2.5	N/A	Provisions relating to monitoring and surveillance removed from PG as duplicated details in data returns guidance.



Reference	Current PG	Draft PG	Record of change to the PG
PG 176	Section 4.2.6	N/A	Provisions relating to sampling visits removed from PG as duplicated details in data returns guidance.
PG 177	N/A	Section 4.5	New section heading.
PG 178	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 179	Section 4.2.8	N/A	Provisions relating to information and intelligence gathering removed from PG as duplicated details in data returns guidance.
PG 180	Section 4.2.9	N/A	Provisions relating to revisits removed as duplicated provisions in section 6.4.1 of the draft Code.
PG 181	Section 4.3	N/A	Section heading removed.
PG 182	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 183	N/A	Section 4.6.2	Provisions relating to template forms moved from section 4.2.2 of the current PG.
PG 184	Section 4.3.2	N/A	Provisions relating to initial inspection of new establishments removed as duplicate provisions in section 2.5.4 of the draft PG.
PG 185	N/A	Section 4.2.4.1	New section added to align with proposals for initial official controls. Provision relating to information collected through communication

Reference	Current PG	Draft PG	Record of change to the PG
			with food business operator moved from section 4.2.4.2 of the current Code.
PG 186	Section 4.3.2.1	Section 4.2.4.2	Terminology amended. Provision relating to where an initial official control may be undertaken as a priority moved from section 4.2.4.2 of the current Code.
PG 187	N/A	Section 4.2.4.3	New section added to align with proposal for initial official controls (proposal 1).
PG 188	N/A	Section 4.2.5	New section added to align with Code. Provision relating to seasonal business closures moved from section 4.3.1 of the current Code.
PG 189	N/A	Section 4.2.6	New section added to align with proposal for initial official controls (proposal 1).
PG 190	Section 4.3.3	N/A	Section heading removed.
PG 191	Section 4.3.3.1	Section 4.3.4.1	Terminology amended. Provision relating to allergen cross-contamination included.
PG 192	Section 4.3.3.2	Section 4.2.2	Terminology amended. Provisions relating to the food hygiene rating scheme removed as duplicated guidance in the FHRS Brand Standard. Clarification provided as to how allergen cross-contamination is considered within the food hygiene intervention rating scheme.
PG 193	Section 4.3.3.3	Section 4.3.4.2	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 194	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 195	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 196	Section 4.4	Section 4.4.2	Provision relating to recital 15 of assimilated 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 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 197	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 198	Section 4.4.1.1	N/A	Provisions relating to seven principles of HACCP removed as duplicated details in HACCP flexibilities guidance.
PG 199	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 200	Section 4.4.2	N/A	Provisions relating to FSA approved assurance schemes removed as duplicate guidance on FSA website.

Reference	Current PG	Draft PG	Record of change to the PG
PG 201	Section 4.4.3	N/A	Provisions relating to model forms removed as duplicate details in primary production guidance.
PG 202	Section 4.5	N/A	Section heading removed.
PG 203	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 204	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. Link to guidance on points of entry with occasional imports removed, as guidance no longer relevant.
PG 205	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.
PG 206	Section 4.5.2.1	Section 4.7.3.1	Provisions relating to assimilated Regulation (EU) 2017/625 and enforcement arrangements moved from section 4.5.1 of current PG. Terminology amended.
PG 207	Section 4.5.2.2	Section 4.7.3.2	Terminology amended.
PG 208	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.

Reference	Current PG	Draft PG	Record of change to the PG
PG 209	Section 4.5.2.4	N/A	Provisions relating to UK safeguard measures removed as duplicated details in inland enforcement guidance.
PG 210	Section 4.5.2.5	Section 4.7.3.4	Terminology amended.
PG 211	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 2.5.3 and section 4.7 of the draft PG. Provision relating to BCPs authorised for higher risk commodities moved from 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 212	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 213	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 214	Section 4.5.4	N/A	Section heading removed.
PG 215	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 216	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.

Reference	Current PG	Draft PG	Record of change to the PG
PG 217	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 218	Section 4.5.5	N/A	Section heading removed.
PG 219	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 220	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 221	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 222	Section 4.5.5.4	N/A	Provisions relating to notification of illegal imports removed as duplicated details in inland enforcement guidance.
PG 223	Section 4.5.5.5	N/A	Provisions relating to prohibitions removed as duplicated details in inland enforcement guidance.
PG 224	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 225	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

Reference	Current PG	Draft PG	Record of change to the PG
			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 226	Section 4.5.7.1	N/A	Provisions relating to deferred examination inland removed as duplicated details in inland enforcement guidance.
PG 227	Section 4.5.8	N/A	Section heading removed.
PG 228	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 229	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 230	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 231	Section 4.5.9.2	N/A	Provisions relating to examination removed as duplicated details in inland enforcement guidance.
PG 232	Section 4.5.9.3	N/A	Provisions relating to deferred examinations removed as duplicated details in inland enforcement guidance.
PG 233	Section 4.5.10	N/A	Provisions relating to onward transportation removed as duplicated details in inland enforcement guidance.
PG 234	Section 4.5.11	N/A	Provisions relating to fees moved to section 4.7.2.1 of the draft Code.
PG 235	Section 4.5.12	N/A	Provisions relating to retention of import documentation moved to section 4.7.2.1 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 236	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 237	Section 4.5.14	N/A	Section heading removed.
PG 238	Section 4.5.14.1	N/A	Provisions related to imported food legislation removed as duplicated details in inland enforcement guidance.
PG 239	Section 4.5.14.2	N/A	Provisions relating to the Trade in Animals and Related Products Regulations 2011 removed as duplicated details in inland enforcement guidance.
PG 240	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 241	Section 4.5.14.4	N/A	Provisions relating to reporting of illegally imported POAO removed as duplicated details in inland enforcement guidance.
PG 242	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 243	N/A	Section 4.3.3.1	Provisions relating to procurement of samples moved from section 4.6 of current PG. Terminology amended.
PG 244	Section 4.6.1	Section 4.3.3.5	Terminology amended.



Reference	Current PG	Draft PG	Record of change to the PG
PG 245	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 246	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 247	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 248	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 4 of the draft Code.
PG 249	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.
PG 250	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 251	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 252	Section 4.6.8	N/A	Provisions relating to certificate of analysis moved to section 4.3.3.2 of the draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 253	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 254	Section 4.6.10	Section 4.3.3.14	Terminology amended.
PG 255	Section 4.6.11	Section 4.3.3.2	Terminology amended.
PG 256	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 257	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 258	Section 4.6.13	Section 4.3.3.15	No change.
PG 259	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.
PG 260	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 261	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 262	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.

Reference	Current PG	Draft PG	Record of change to the PG
PG 263	Section 4.6.18	N/A	Provisions relating to certificates of examination moved to section 4.3.3.3 of the draft Code.
PG 264	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 265	Section 4.6.20	N/A	Provisions relating to requests for examination moved to section 4.3.3.3 of the draft Code.
PG 266	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 267	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 268	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.
PG 269	N/A	Section 4.3.3.20	Terminology amended. Provisions relating to scientific investigation of food complaint samples moved from section 6.3.3 of the current PG.
PG 270	Section 4.7	N/A	Section heading removed.
PG 271	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.

Reference	Current PG	Draft PG	Record of change to the PG
PG 272	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 273	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 274	Section 4.7.3	N/A	Provisions relating to catering waste removed as provisions the same for all establishments.
PG 275	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 276	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.
PG 277	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 278	Section 4.7.6	Section 4.4.1.6	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 279	Section 4.7.7	Section 4.4.1.7	Terminology amended. Provisions relating to contact details removed as no longer correct, details replaced with a link to Primary Authority register instead.
PG 280	Section 4.7.8	N/A	Section heading removed.
PG 281	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 282	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.
PG 283	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 284	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

Reference	Current PG	Draft PG	Record of change to the PG
			action to take on conclusion of an inspection, including discussion of findings moved to section 4.4.1.2 of the draft Code.
PG 285	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 286	N/A	Section 4.4.1.13	Provisions relating to FHRS moved from section 4.7.8.5 of current PG.
PG 287	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 288	Section 4.7.8.7	N/A	Provisions relating to risk criteria moved to section 4.4.1.9 of draft PG.
PG 289	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.
PG 290	Section 4.7.9	N/A	Section heading removed.
PG 291	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

Reference	Current PG	Draft PG	Record of change to the PG
			obtained is used to determine whether to board an aircraft moved to section 4.4.1.16 of draft PG.
PG 292	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 293	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 294	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 295	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.
PG 296	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 297	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.

Reference	Current PG	Draft PG	Record of change to the PG
PG 298	Section 5.1	Section 5.1	Terminology amended.
PG 299	Section 5.2	Section 5.2	No change.
PG 300	Section 5.2.1	Section 5.2.1	Terminology amended.
PG 301	Section 5.2.2	Section 5.2.2	Terminology amended.
PG 302	Section 5.2.3	Section 5.2.3	Terminology amended. Point added in relation to notifying a food incident where a CA becomes aware of food fraud and crime.
PG 303	Section 5.2.4	Section 5.2.4	Reference to PHE changed to UKHSA.
PG 304	Section 5.2.5	Section 5.2.5	Terminology amended. Provision relating to undertaking a root cause analysis moved to section 5.3.5 of the draft Code.
PG 305	Section 5.3	N/A	Section heading removed.
PG 306	Section 5.3.1	Section 5.4	Provisions relating to the role of NFCU amended.
PG 307	Section 5.3.2	Section 5.4.1	Provisions relating to reporting suspicions of food crime to the NFCU amended.
PG 308	Section 5.4	Section 5.3	No change.
PG 309	Section 5.4.1	Section 5.3.1	Provision relating to the section being under review removed.
PG 310	Section 5.4.2	N/A	Provision relating to notification of food hazards or incidents regarding imported food removed, as only provided that the section was under review.



Reference	Current PG	Draft PG	Record of change to the PG
PG 311	Section 5.4.3	N/A	Provision relating to trans-border matters removed, as only provided that the section was under review.
PG 312	Section 5.4.4	Section 5.3.2	Provisions relating to communication with countries outside the UK moved to section 5.5.2 of the draft Code.
PG 313	Section 5.4.5	Section 5.3.3	Terminology amended.
PG 314	Section 5.4.6	Section 5.3.4	Terminology amended.
PG 315	Section 6.1	Section 6.1	Terminology amended.
PG 316	Section 6.2	N/A	Heading removed.
PG 317	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 318	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 319	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.
PG 320	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.

Reference	Current PG	Draft PG	Record of change to the PG
PG 321	Section 6.3	N/A	Provision relating to food complaints removed as not relevant to the enforcement chapter.
PG 322	Section 6.3.1	N/A	Provision relating to food complaints removed as not relevant to the enforcement chapter.
PG 323	Section 6.3.2	N/A	Provision relating to food complaints removed as not relevant to the enforcement chapter. Provision regarding involvement of other Competent Authorities duplicated in section 2.5.1 of draft Code and PG.
PG 324	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 325	Section 6.4	Section 6.3	Title amended.
PG 326	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 327	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.
PG 328	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. Provision

Reference	Current PG	Draft PG	Record of change to the PG
			relating to public interest moved from section 2.3.10 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 Crown Prosecutors and the Regulators' Code moved from section 6.2 of current Code. Provision regarding discussing decisions moved from section 6.4.2 of current Code. Terminology amended.
PG 329	Section 6.4.2	N/A	Provision relating to enforcement information removed as provisions duplicated in section 2.3 of draft Code.
PG 330	Section 6.4.3	Section 6.8.3	Terminology amended.
PG 331	Section 6.5	Section 6.2	Title amended.
PG 332	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 333	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 334	Section 6.5.3	Section 6.2.2	Terminology amended.
PG 335	Section 6.5.4	N/A	Provision relating to non-food notices removed as not relevant to food law.
PG 336	Section 6.6	Section 6.4	No change.
PG 337	Section 6.6.1	Section 6.4.1	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 338	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 339	Section 6.6.3	Section 6.4.2	Terminology amended
PG 340	Section 6.6.4	Section 6.4.2.1	Terminology amended.
PG 341	Section 6.6.5	Section 6.4.3	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 342	Section 6.6.6	Section 6.4.4	Terminology amended.
PG 343	Section 6.6.7	Section 6.4.5	Terminology amended.
PG 344	Section 6.6.8	Section 6.4.5.1	Terminology amended.
PG 345	Section 6.6.9	N/A	Provisions relating to service of notice removed as duplicated provisions in section 6.4 of draft Code.
PG 346	Section 6.6.9.1	Section 6.4.6	Terminology amended.
PG 347	Section 6.6.10	Section 6.4.7	Terminology amended. Provision relating to time limit to apply to the First-tier Tribunal added. Provision in table relating to where Improvement Notice appeals are heard amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 348	Section 6.6.11	Section 6.4.8	Terminology amended. Provision relating to Primary Authority partnership removed due to duplication of provisions in section 6.3.3 of the draft PG.
PG 349	Section 6.6.12	Section 6.4.9	Terminology amended.
PG 350	Section 6.6.13	Section 6.4.10	Terminology amended. Provision relating to checking work moved to section 6.4.2 of draft Code.
PG 351	Section 6.6.14	Section 6.4.11	Terminology amended.
PG 352	Section 6.6.15	Section 6.4.12	Terminology amended.
PG 353	Section 6.6.16	Section 6.4.13	Terminology amended.
PG 354	Section 6.6.17	Section 6.4.14	Terminology amended.
PG 355	Section 6.7	Section 6.5	No change.
PG 356	Section 6.7.1	Section 6.5.1	Terminology amended.
PG 357	Section 6.7.1.1	Section 6.5.2	Terminology amended.
PG 358	Section 6.7.1.2	Section 6.5.3	Terminology amended.
PG 359	Section 6.7.2	Section 6.5.4	Terminology amended.
PG 360	Section 6.7.2.1	Section 6.5.4.1	Title amended. Terminology amended.
PG 361	Section 6.7.2.2	Section 6.5.4.2	Title amended. Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 362	Section 6.7.3	Section 6.5.5	Terminology amended.
PG 363	Section 6.7.3.1	Section 6.5.5.1	Title amended. Terminology amended.
PG 364	Section 6.7.3.2	Section 6.5.5.2	Title amended. Terminology amended.
PG 365	Section 6.7.3.3	Section 6.5.5.3	Title amended. Terminology amended.
PG 366	Section 6.7.4	Section 6.5.6	Terminology amended.
PG 367	Section 6.7.5	Section 6.5.7	Terminology amended.
PG 368	Section 6.7.6	Section 6.5.8	Terminology amended.
PG 369	Section 6.7.6.1	Section 6.5.8.1	Terminology amended.
PG 370	Section 6.7.7	Section 6.5.9	Title amended.
PG 371	Section 6.7.7.1	Section 6.5.9.1	Terminology amended.
PG 372	Section 6.7.7.2	Section 6.5.9.2	Removed reference to legislation. Terminology amended.
PG 373	Section 6.7.7.3	Section 6.5.9.3	Terminology amended.
PG 374	Section 6.7.7.4	Section 6.5.9.4	Terminology amended.
PG 375	Section 6.8	Section 6.5.10	No change.
PG 376	Section 6.8.1	Section 6.5.10.1	Terminology amended.
PG 377	Section 6.8.2	Section 6.5.10.2	Terminology amended. Provision relating to monitoring removed due to duplication of provision in section 6.4.2 of draft Code.

Reference	Current PG	Draft PG	Record of change to the PG
PG 378	Section 6.8.3	Section 6.5.11	Terminology amended.
PG 379	Section 6.9	Section 6.5.12	Terminology amended.
PG 380	Section 6.10	Section 6.5.13	No change.
PG 381	Section 6.10.1	Section 6.5.13.1	Provision added relating to notice ceasing to have effect. Terminology amended.
PG 382	Section 6.10.2	Section 6.5.13.2	Terminology amended.
PG 383	Section 6.10.3	Section 6.5.13.3	Terminology amended. Replaced reference of 'notice of refusal' with 'notice of continuing risk to health'.
PG 384	Section 6.11	Section 6.5.14	Terminology amended.
PG 385	Section 6.12	Section 6.6	No change.
PG 386	Section 6.12.1	Section 6.6.1	Terminology amended.
PG 387	Section 6.12.2	Section 6.6.2	Terminology amended.
PG 388	Section 6.12.2.1	Section 6.6.2.1	Terminology amended.
PG 389	Section 6.12.2.2	Section 6.6.2.2	No change.
PG 390	Section 6.12.2.3	Section 6.6.2.3	Terminology amended.
PG 391	Section 6.12.3	Section 6.6.3	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 392	Section 6.12.3.1	Section 6.6.4	Replaced Public Health England (PHE) with United Kingdom Health Security Agency (UKHSA).
PG 393	Section 6.12.4	Section 6.6.5	Terminology amended.
PG 394	Section 6.12.4.1	Section 6.6.5.1	Terminology amended.
PG 395	Section 6.12.4.2	Section 6.6.5.2	Terminology amended.
PG 396	Section 6.12.4.3	Section 6.6.5.3	Terminology amended.
PG 397	Section 6.12.5	Section 6.6.6	No change.
PG 398	Section 6.12.5.1	Section 6.6.6.1	Terminology amended.
PG 399	Section 6.12.5.2	Section 6.6.6.2	Terminology amended. Replaced 'Notification' with 'Warning Notice'.
PG 400	Section 6.12.5.3	Section 6.6.6.3	Terminology amended. Replaced 'Notification' with 'Warning Notice'. Added reference to 'the person in charge of the food'. Provisions relating to notices of seizure moved from section 6.12.5.4 of current PG.
PG 401	Section 6.12.5.4	N/A	Provisions relating to notices of seizure moved to section 6.6.6.3 of draft PG.
PG 402	Section 6.12.6	Section 6.6.7	Terminology amended.
PG 403	Section 6.13	Section 6.7	No change.



Reference	Current PG	Draft PG	Record of change to the PG
PG 404	Section 6.13.1	Section 6.7.1	Terminology amended. Reference to enforcement policy removed as duplicated provision in section 6.3.4 of draft Code.
PG 405	Section 6.13.2	Section 6.7.2	Terminology amended.
PG 406	Section 6.13.3	Section 6.7.3	Terminology amended.
PG 407	N/A	Section 6.8	New section providing information relating to prosecution.
PG 408	N/A	Section 6.8.1	New section providing information relating to prosecution.
PG 409	N/A	Section 6.8.2	New section providing information relating to time limits for prosecution.
PG 410	N/A	Section 6.9	New section providing information relating to follow-up checks. Provision relating to timing moved from section 6.5 of current Code. Terminology amended.
PG 411	Section 6.14	Section 6.10	No change.
PG 412	Section 6.14.1	Section 6.10.1	Terminology amended. Provisions relating to availability of Remedial Action Notices (RANs) in establishments that require approval but that are not yet approved, and FSA approvals guidance added.
PG 413	Section 6.14.2	N/A	Provisions relating to suspension of approval removed as duplication of provisions in FSA approvals guidance.
PG 414	Section 6.14.3	N/A	Provisions relating to withdrawal of approval removed as duplication of provisions in FSA approvals guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 415	Section 6.14.4	Section 6.10.2	Terminology amended.
PG 416	Section 6.14.5	Section 6.10.3	No change.
PG 417	Section 6.14.6	Section 6.10.4	Title amended. Terminology amended.
PG 418	Section 6.14.6.1	Section 6.10.4.1	Terminology amended. Provision relating to establishments that require approval but that are not yet approved added.
PG 419	Section 6.14.6.2	Section 6.10.4.2	Terminology amended. Provision relating to difference of detention notices added.
PG 420	Section 6.14.7	Section 6.10.5	Terminology amended.
PG 421	Section 6.15	Section 6.11	No change.
PG 422	Section 6.15.1	Section 6.11.1	No change.
PG 423	Section 6.15.1.1	Section 6.11.1.1	Terminology amended. Provision relating to Inland Enforcement of Imported Food Controls Resource Pack guidance added.
PG 424	Section 6.15.1.2	Section 6.11.1.2	Terminology amended.
PG 425	Section 6.15.1.3	Section 6.11.1.3	Terminology amended.
PG 426	Section 6.15.1.4	Section 6.11.1.4	Terminology amended.
PG 427	Section 6.15.1.5	Section 6.11.1.5	Terminology amended. Provision relating to contacting the FSA added.
PG 428	Section 6.15.1.6	Section 6.11.1.6	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 429	Section 6.15.1.7	Section 6.11.1.7	Terminology amended.
PG 430	Section 6.15.2	Section 6.11.2	Title amended.
PG 431	Section 6.15.3	Section 6.11.3	Terminology amended.
PG 432	Section 6.16	Section 6.12	No change.
PG 433	Section 6.16.1	Section 6.12.1	Terminology amended.
PG 434	Section 6.16.2	Section 6.12.2	Title amended.
PG 435	Section 6.16.2.1	Section 6.12.2.1	Terminology amended.
PG 436	Section 6.16.2.2	Section 6.12.2.2	Terminology amended.
PG 437	Section 6.16.2.3	Section 6.12.2.3	Title amended. Terminology amended.
PG 438	Section 6.16.3	Section 6.12.3	Terminology amended.
PG 439	Section 6.16.3.1	Section 6.12.3.1	Terminology amended.
PG 440	Section 6.16.4	Section 6.12.4	No change.
PG 441	Section 6.16.4.1	Section 6.12.4.1	Terminology amended.
PG 442	Section 6.16.4.2	Section 6.12.4.2	Terminology amended.
PG 443	Section 6.16.4.3	Section 6.12.4.3	Terminology amended.
PG 444	Section 6.16.4.4	Section 6.12.4.4	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 445	Section 6.16.4.5	Section 6.12.4.5	Terminology amended.
PG 446	Section 7.1	N/A	Section heading removed.
PG 447	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 448	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.
PG 449	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 450	Section 7.1.3	N/A	Provisions relating to harvesting from outside classified production areas and conducting verification checks moved to section 7.3.1 of draft Code.
PG 451	Section 7.1.4	N/A	Provisions regarding permitted treatment methods removed due to duplication with other FSA LBM and/or approvals guidance.
PG 452	Section 7.1.5	Section 7.4	Terminology amended. Provisions relating to inclusion of fishermen or shellfish gatherers moved from section 7.2 of current Code. Provision relating to joint sampling plans removed. Provision relating to FSA LBM guidance added.
PG 453	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

Reference	Current PG	Draft PG	Record of change to the PG
			of classified LBM production and relaying areas moved to section 7.3.1 of draft PG.
PG 454	N/A	Section 7.5	New section providing information relating to registration documents and exemptions.
PG 455	N/A	Section 7.5.1	New section providing information relating to examination of registration documents. Provisions relating to registration documents accompanying batches and retention of documents moved from section 7.3.1 of current Code.
PG 456	Section 7.1.7	Section 7.5.2	Title amended. Terminology amended. Some provisions relating to registration documents removed due to duplication of provision in section 7.5.1 of draft Code. Provisions relating to sampling removed due to duplication with other FSA LBM guidance. Provisions relating to verification moved to section 7.5.3 of draft Code. Provisions relating to verifying and monitoring moved to section 7.5.3 of draft PG.
PG 457	N/A	Section 7.5.3	New section providing information relating to verifying and monitoring registration documents. Provisions relating to verifying and monitoring documentation moved from section 7.1.7 of current PG. Terminology amended.
PG 458	Section 7.1.8	N/A	Provision relating to sampling of LBM by FBOs removed due to duplication with other FSA LBM guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 459	Section 7.1.9	N/A	Provision relating to laboratories used removed due to duplication with other FSA LBM guidance.
PG 460	Section 7.1.10	N/A	Provision relating to testing of LBM removed due to duplication with other FSA LBM guidance.
PG 461	Section 7.1.11	N/A	Provision relating to marine biotoxins removed due to duplication with other FSA LBM guidance.
PG 462	Section 7.1.12	N/A	Provision relating to sampling removed due to duplication with other FSA LBM guidance.
PG 463	Section 7.1.13	Section 7.8	Terminology amended.
PG 464	Section 7.1.14	N/A	Provisions relating to LBM which fail to satisfy requirements moved to section 7.7 of draft Code.
PG 465	N/A	Section 7.3	New section providing information relating to production and relaying areas.
PG 466	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 467	Section 7.1.15	Section 7.3.2	Terminology amended.
PG 468	N/A	Section 7.6	New section providing information relating to action following a non-compliant sample.

Reference	Current PG	Draft PG	Record of change to the PG
PG 469	Section 7.1.16	Section 7.6.1	Title amended. Terminology amended. Provisions relating to actions states and Closure Notice considerations removed due to duplication with other FSA LBM guidance. Provisions relating to notification and display of Closure Notices moved from section 7.5 of current Code.
PG 470	Section 7.1.17	Section 7.7	Terminology amended.
PG 471	Section 7.1.18	Section 7.9	Terminology amended.
PG 472	Section 7.1.19	Section 7.10	Terminology amended.
PG 473	N/A	Section 8.1	New section to provide information relating to content of the chapter and link to FSA approvals guidance.
PG 474	Section 7.2	Section 8.2	No change.
PG 475	Section 7.2.1	Section 8.2.1	Terminology amended.
PG 476	Section 7.2.2	Section 8.2.2	Terminology amended.
PG 477	Section 7.2.3	Section 8.2.3	Terminology amended.
PG 478	Section 7.2.4	Section 8.2.4	Terminology amended
PG 479	Section 7.2.5	N/A	Provisions relating to conditions during and after landing removed due to other FSA guidance regarding approvals and fishery products.
PG 480	Section 7.2.6	N/A	Provisions relating to guidance moved to section 8.2.5 of draft PG.

Reference	Current PG	Draft PG	Record of change to the PG
PG 481	Section 7.2.7	Section 8.2.5	Title amended. Terminology amended. Provision relating to Seafish guidance moved from section 7.2.6 of current PG.
PG 482	Section 7.3	Section 8.3	No change.
PG 483	Section 7.3.1	N/A	Provision regarding meat guidance removed as does not relate to content of section.
PG 484	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 485	Section 7.3.3	Section 8.3.2	No change.
PG 486	Section 7.3.3.1	Section 8.3.2.1	No change.
PG 487	Section 7.3.3.2	Section 8.3.2.2	No change.
PG 488	Section 7.3.3.3	N/A	Provision relating to cold stores removed due to duplication with FSA approvals guidance.
PG 489	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.
PG 490	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 491	Section 7.3.4	Section 8.3.3	Terminology amended.



Reference	Current PG	Draft PG	Record of change to the PG
PG 492	Section 7.3.4.1	N/A	Provisions relating to exemptions from approval removed due to duplication with FSA approvals guidance.
PG 493	Section 7.3.4.2	N/A	Provisions relating to exemptions from approval removed due to duplication with FSA approvals guidance.
PG 494	Section 7.3.4.3	N/A	Provisions relating to exemptions from approval removed due to duplication with FSA approvals guidance.
PG 495	Section 7.3.4.4	N/A	Provision relating to wild game removed due to duplication with FSA approvals and wild game guidance.
PG 496	Section 7.3.4.5	Section 8.3.3.1	Terminology amended.
PG 497	Section 7.3.5	Section 8.3.4	No change.
PG 498	Section 7.3.6	Section 8.3.5	Title amended. Terminology amended.
PG 499	Section 7.3.7	N/A	Provision relating to wild game sector removed due to duplication with FSA wild game guidance.
PG 500	Section 7.3.8	Section 8.3.6	Terminology amended.
PG 501	Section 7.3.9	Section 8.3.7	No change.
PG 502	Section 7.4	Section 8.4	No change.
PG 503	Section 7.4.1	Section 8.4.1	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 504	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 505	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 506	Section 7.4.4	Section 8.4.4	Terminology amended.
PG 507	Section 7.4.5	Section 8.4.5	Terminology amended.
PG 508	Section 7.4.6	Section 8.4.6	Terminology amended. Provisions relating to heat treatment removed due to duplication with section 8.4.8 of draft PG.
PG 509	Section 7.4.7	Section 8.4.7	Terminology amended. Provisions relating to time and temperature for treated milk moved to section 8.4.8 of draft PG.
PG 510	Section 7.4.8	Section 8.4.8	Terminology amended. Provisions relating to time and temperature for treated milk moved from section 7.4.7 of current PG.
PG 511	Section 7.4.9	Section 8.4.9	Terminology amended.
PG 512	Section 7.4.10	Section 8.4.10	No change.
PG 513	Section 7.4.11	Section 8.4.11	No change.
PG 514	Section 7.4.11.1	Section 8.4.11.1	Terminology amended.
PG 515	Section 7.4.11.2	Section 8.4.11.2	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 516	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 517	Section 7.4.11.4	Section 8.4.11.3	Terminology amended. Additional provisions relating to actions to be taken on stocks of raw milk-based products following loss of OFT status added.
PG 518	Section 7.4.11.5	Section 8.4.11.4	Title amended. Terminology amended.
PG 519	Section 7.4.11.6	Section 8.4.11.5	Terminology amended.
PG 520	Section 7.5	Section 8.5	No change.
PG 521	Section 7.5.1	Section 8.5.1	Terminology amended.
PG 522	Section 7.5.2	Section 8.5.2	Terminology amended
PG 523	Section 7.5.3	Section 8.5.3	Terminology amended. Provision relating to hen establishments with 350 or more laying hens added.
PG 524	Section 7.5.4	Section 8.5.4	Terminology amended.
PG 525	Section 7.5.5	Section 8.5.5	Provision relating to assurance schemes removed as provisions not relevant to regulations within section 8.5.1 of draft PG.
PG 526	Section 7.6	Section 8.6	No change.
PG 527	Section 7.6.1	Section 8.6.1	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 528	Section 7.6.2	Section 8.6.2	Terminology amended.
PG 529	Section 7.6.3	Section 8.6.3	Terminology amended.
PG 530	Section 7.6.4	Section 8.6.4	Terminology amended.
PG 531	Section 7.6.5	Section 8.6.5	Terminology amended.
PG 532	Section 7.6.6	Section 8.6.6	Title amended. Terminology amended.
PG 533	Section 7.6.7	Section 8.6.7	Terminology amended.
PG 534	Section 7.6.8	Section 8.6.8	Terminology amended.
PG 535	Section 7.6.9	Section 8.6.9	Terminology amended.
PG 536	Section 7.6.10	Section 8.6.10	Terminology amended.
PG 537	N/A	Section 8.7	New section providing information relating to small quantities.
PG 538	N/A	Section 8.7.1	New section providing information relating to small quantities of primary products.
PG 539	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 540	Section 7.7.1	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 541	Section 7.7.2	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 542	Section 7.7.2.1	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 543	Section 7.7.2.2	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 544	Section 7.7.3	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 545	Section 7.7.4	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 546	Section 7.7.5	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 547	Section 7.7.6	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 548	Section 7.7.7	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 549	Section 7.7.8	N/A	Provisions relating to food for specific groups removed due to duplication with DHSC guidance.
PG 550	Section 7.8	Section 8.9	No change.
PG 551	Section 7.8.1	Section 8.9.1	Terminology amended.
PG 552	Section 7.8.2	Section 8.9.2	Terminology amended.

Reference	Current PG	Draft PG	Record of change to the PG
PG 553	Section 7.8.3	Section 8.9.3	Terminology amended.
PG 554	Section 7.8.4	Section 8.9.4	Terminology amended.
PG 555	Section 7.8.5	Section 8.9.5	Terminology amended.
PG 556	Section 7.8.6	Section 8.9.6	Terminology amended.
PG 557	Section 7.8.7	Section 8.9.7	Terminology amended.
PG 558	Section 7.8.8	Section 8.9.8	Terminology amended.
PG 559	Section 7.8.9	Section 8.9.9	Terminology amended.
PG 560	Section 7.8.10	Section 8.9.10	Terminology amended.
PG 561	Section 7.8.11	Section 8.9.11	Terminology amended.
PG 562	Section 7.8.12	Section 8.9.12	Terminology amended.
PG 563	Section 7.9	Section 8.10	No change.
PG 564	Section 7.9.1	Section 8.10.1	Title amended. Terminology amended. Provisions relating to bottled water removed due to duplication with Defra guidance.
PG 565	Section 7.9.2	N/A	Provisions relating to bottled water removed due to duplication with Defra guidance.
PG 566	Section 7.9.3	N/A	Provisions relating to natural mineral waters removed due to duplication with Defra guidance.

Reference	Current PG	Draft PG	Record of change to the PG
PG 567	Section 7.9.4	N/A	Provisions relating to natural mineral waters removed due to duplication with Defra guidance.
PG 568	Section 7.9.5	N/A	Provisions relating to natural mineral waters removed due to duplication with Defra guidance.
PG 569	Section 7.9.6	N/A	Provisions relating to natural mineral waters removed due to duplication with Defra guidance.
PG 570	Section 7.9.7	N/A	Provisions relating to bottled water removed due to duplication with Defra guidance.
PG 571	Section 7.9.8	N/A	Provisions relating to bottled water removed due to duplication with Defra guidance.
PG 572	Section 7.10	Section 8.11	No change.
PG 573	Section 7.10.1	Section 8.11.1	Terminology amended.
PG 574	N/A	Section 8.11.2	New section providing information relating to catering waste. Provisions moved from section 4.7.3 of current Code. Terminology amended.
PG 575	Section 7.10.2	Section 8.11.3	Title amended. Terminology amended.
PG 576	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.

Reference	Current PG	Draft PG	Record of change to the PG
PG 577	Section 7.10.4	Section 8.11.5	Terminology amended. Provision relating to identifying feed authority removed as information is commonly known to CAs.
PG 578	Section 7.10.5	Section 8.11.6	Terminology amended.
PG 579	Section 7.10.6	Section 8.11.7	Terminology amended.
PG 580	Section 7.10.7	Section 8.11.8	Terminology amended.
PG 581	Section 7.11	Section 8.12	No change.
PG 582	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 583	Section 7.11.2	N/A	Provision relating to location of seller moved to section 8.12.1 of draft PG.
PG 584	Section 7.11.3	Section 8.12.2	Terminology amended.
PG 585	Section 7.11.4	Section 8.12.3	No change.
PG 586	Section 7.11.5	Section 8.12.4	Title amended. Terminology amended. Provisions relating to legislation and central UK Competent Authority moved to section 8.12.1 of draft PG.
PG 587	Section 7.12	Section 8.13	No change.



Reference	Current PG	Draft PG	Record of change to the PG
PG 588	Glossary	Glossary	Terminology amended. Definitions for terms not used in PG removed.
PG 589	N/A	Annex 3	Guidance on parts two and three of the food hygiene intervention rating scheme moved from FHRS Brand Standard to the draft PG.

