

Review of the Food Law Code of Practice, Food Law Practice Guidance and implementation of the Competency Framework – Wales

Summary of stakeholder responses

July 2021

Introduction

What was the background to the consultation?

Local Authorities (LAs) are the Competent Authorities responsible for delivering official food controls and other official activities in most food establishments in Wales including manufacturers, supermarkets, restaurants, pubs, hospitals and schools and other places where people buy and eat food. LAs, which also undertake port health functions, carry out a range of official food controls on products of animal origin, and certain foods not of animal origin arriving into the United Kingdom (UK).

The Food Law Code of Practice (Wales), (the Code) sets out instructions and criteria to which LAs in Wales must have regard when discharging their duties in relation to the delivery of official food control activities (separate but parallel Codes are issued in each of the UK countries). The Food Law Practice Guidance (Wales), (Practice Guidance) complements the Code and provides general advice on approach to enforcement where its intention might be unclear. LAs must have regard to the relevant chapters of the Practice Guidance which are specifically referenced to within the Code.

The Code requires regular review and revision to ensure that it reflects current policy and legislative requirements so that LAs delivery of official food controls and other official activities remains effective, consistent, and proportionate.

The key changes in this revision of the Code were critical to addressing the urgent need for LAs to be able to recruit, train and deploy additional officers so that they can deal with the increase in their workload to undertake additional requirements for imported and exported food controls and help address reductions in resources resulting from redeployment of staff and staff absences during the COVID-19 pandemic. Views were also sought on other changes that were proposed to ensure the Code reflects current priorities, policy, and legislative requirements.

There will be further reviews of the Code over the next few years, to review the regulatory delivery model, and deliver on the various aspects of the Food Standards Agency's (FSA's) modernisation programme.

What did we consult on?

The key changes on which we sought views were:

- The modernisation of the qualification requirements to enable LAs to fully recognise the potential of a wider cohort of environmental health and trading standards professionals to undertake food control activities providing they can demonstrate they are competent
- replacing the existing competency requirements with the FSA 'Knowledge and skills for the effective delivery of official food and feed controls and other activities' (the Competency Framework) that defines competency by activity rather than by role
- the introduction of a provision to enable the FSA to be more responsive in issuing instructions, whereby LAs may legitimately depart from the Code in limited circumstances
- revisions to reflect legislative changes such as the coming into effect of the Official Controls Regulation (EU) 2017/625 in December 2019, and EU exit implications
- simplification of the structure and format of the Code to promote consistency in its interpretation and implementation
- The inclusion of other minor amendments to keep pace with current practices

The [full consultation package](#) is published on our website.

Separate but similar consultations took place in England and Northern Ireland from 13 November 2020.

Who did we consult?

A series of stakeholder engagement events began in October 2020 and were followed by a formal 14-week consultation on 18 December 2020. To support LAs whilst also managing the response to the pandemic, the FSA organised and facilitated two engagement events, attended a discussion event with the Directors of Public Protection Wales (DPPW) and offered support to DPPW so that they could take on administrative resources and release competent food officers to focus on food controls and the COVID-19 pandemic.

A full list of stakeholders who were informed of the consultation is listed in [Annex A](#).

What did stakeholders say and what is our response to this?

We are very grateful for the substantive responses that were received. A full list of the respondents can be found at [Annex B](#). The tables that follow summarise the responses to the consultation in terms of the questions set out in the consultation package. We have given very careful consideration to the comments provided and the views expressed and our response to these is also set out.

Summary of substantive comments and FSA response

Question 1

Does the layout/presentation and clarified text of the proposed Code and the Practice Guidance make the documents easier to use, improve readability, and facilitate consistent interpretation? If not, how could they be improved?

What did stakeholders say?	What is the FSA's response?
There was general agreement that the documents were easy to read and interpret.	The proposed changes will be made to the Code and Practice Guidance.
The length of the documents collectively was highlighted.	<p>The Code has been streamlined and substantially reduced in length. The intention for future reviews is to reduce the length of the Practice Guidance, by providing links in areas where there is already guidance available, or the requirement is stated in legislation.</p> <p>We are also exploring digital solutions to the hosting of the Code and the Practice Guidance via e-books for example, which would enable linking between both documents, and external websites (including to legislation). This will make navigation much simpler and reduce unnecessary duplication.</p>

Question 2

Do you agree that the proposed 'suitable qualification' requirements provide LAs with the ability to deploy current resources more efficiently by, allowing a wider cohort of professionals to undertake food control activities, which the Code restricts? If not, why not? (Please specify any additional flexibility you would wish to see, and why)

What did stakeholders say?	What is the FSA's response?
<p>Some stakeholders recognise the need for the increased flexibility to utilise appropriate officers at the right level to increase capacity and agree that the proposed requirements appear to offer a pathway to achieve this.</p>	<p>Comment noted</p>
<p>It was generally agreed that the proposed suitable qualification requirements would allow a wider cohort of individuals to undertake food control activities, but they did not think the changes would provide the ability to deploy existing resources, as this is dependent on funding and the availability of officers with the underlying knowledge and skills to perform the role.</p>	<p>Comment noted</p>
<p>Concerns were raised regarding:</p> <ul style="list-style-type: none"> • the removal of the professional qualification • the broadening of the suitable qualification potentially resulting in health protection in the UK being weakened • some of the qualifications listed only being held by a small number of officers in employment • the risk of unqualified officers having their credentials challenged 	<p>We recognise the value that qualifications have in providing knowledge and skills for individuals and that they are an excellent way for an individual to demonstrate competency.</p> <p>The proposed amendments to the Code do not remove the requirements for officers to hold a 'suitable qualification', other than Regulatory Support Officers (RSOs) and officers undertaking controls on Products of Animal Origin (POAO) at Border Control Posts (BCPs).</p>

What did stakeholders say?	What is the FSA's response?
<ul style="list-style-type: none"> • LAs/PHAs being tempted to take the cheapest option to recruit if qualifications are removed • anomaly between the Higher Certificate in Food Control and APC in Food compared to the environmental health degree/MSc • LA officers not being as qualified as officers employed by large FBOs. Impact on international trade because of the changes to the qualification requirements of those who can provide assurance on food 	<p>Whilst we note the concerns and have considered the points raised by the LAs, the proposed approach is to enable each LA to determine the requirements for the officers they are looking to recruit. The list of 'suitable qualifications' includes all of the qualifications that were included in the previous version of the Code as baseline qualifications. In the proposed Code the list is wider than the current list of baseline qualifications, but they are all assessed by an independent body.</p> <p>The Chartered Institute of Environmental Health (CIEH) have closed the Environmental Health Registration Board (EHRB) to new applications and the replacement to launch a new pathway to registration is scheduled for September 2021. The CIEH are affording graduates the choice of either choosing the new pathway to registration if they want to demonstrate competency across all 5 areas of Environmental Health or if they would prefer they can complete the Competency Development Portfolio (CDP) which is food specific and officers will be placed on the register of food professionals rather than the register of Environmental Health practitioners.</p> <p>The removal of certain qualification restrictions enables LAs/Port Health Authorities (PHAs) to deploy officers, recognising that competency can be demonstrated through a wider range of qualifications, training, and relevant experience.</p> <p>It is recognised that, as is the case now, not all the 'suitable qualifications' incorporate the underpinning knowledge required</p>

What did stakeholders say?	What is the FSA's response?
	<p>to undertake the full range of official food controls, but they do all provide relevant knowledge of food hygiene and/or food standards legislation and official food controls. Before an officer can be authorised to deliver official food controls their competency must be assessed by their lead food officer (LFO) or other suitably qualified and competent officer who will support the LFO to assess against the competencies within the Competency Framework.</p> <p>If an officer is unable to demonstrate all the competencies for specific activities, for example because they were not included within their qualification and had not been gained by other means, they must not be authorised to undertake those activities.</p> <p>In relation to officer authorisations being challenged in court, particularly on grounds of competency. The procedure for authorising officers has not been amended, with officers still being required to hold a 'suitable qualification' (except RSOs and officers undertaking controls on POAO at BCPs), and their competency determined by a lead officer, which was the case previously. In all cases, LAs would still need to ensure all officers are competent and authorised in accordance with their authorisation procedure.</p>
<p>Concerns about the removal of the qualification requirements for those delivering official controls at BCPs without including a requirement that such individuals will require supervision by</p>	<p>The changes align the Code to the amendments made to the Trade in Animals and Related Products (Wales) Regulations 2011, to allow suitably trained Environmental Health Officers</p>

What did stakeholders say?	What is the FSA's response?
<p>suitable qualified and experienced officers. Stakeholders are of the opinion that urgent workforce capacity shortfalls, such as those identified at BCPs should be addressed through a co-produced solution, comprising specialist training which will be recognised in the Code.</p>	<p>(EHOs) or other persons who are appropriately trained to perform official food controls or certain tasks related to other official activities, to be official fish inspectors. It also aligns to the approach taken in relation to official feed controls at points of entry in Wales.</p> <p>Officers undertaking official food controls or certain tasks related to other official activities on food not of animal origin inland, or at BCPs must hold a 'suitable qualification', be able to demonstrate their competency for the activities they will be authorised to perform and be appropriately trained as detailed in section 3.6 of the Code.</p> <p>Officers performing official food controls or certain tasks related to other official activities on POAO at BCPs are not required to hold a 'suitable qualification' but must be able to demonstrate their competency for the activities they will be authorised to perform and be appropriately trained (see section 3.5 of the Code).</p> <p>Officers who are designated to undertake or assist with physical checks on POAO must have completed a programme of training provided for in Article 3 of Commission Delegated Regulation (EU) 2019/1081, in accordance with Articles 49(2)(a) and 49(2)(b) of Regulation (EU) 2017/625.</p>

What did stakeholders say?	What is the FSA's response?
	We have revised sections 3.5 and 3.6 of the Code, adding clarity to the roles, responsibilities, qualification, and competency requirements for staff undertaking import controls on animals and goods arriving at BCPs.
One stakeholder commented that officers who have not attained a professional qualification should not be practising under the title of EHO.	The title which an officer is given is the decision of the LA as the Competent Authority.
Stakeholders referred to the footnote in the Code, which states that the qualifications listed all require 'successful completion of all elements, including written exams, portfolios, oral exams, practical exams, professional interviews, as specified by the awarding body.' Stakeholders clarified that this is not necessarily the case for those qualifications awarded by bodies other than the professional institutes.	Comment noted. Footnote removed from the Code of Practice.
We would respectfully request that the requirement for courses to be accredited is included in the Code. It should be further noted that these graduates will not have attained a professional qualification may not have any experience of applying their knowledge in a work setting.	We have considered restricting qualifications to only those courses that are accredited and have had discussions with the CIEH regarding their accredited course scheme. As there is no prescribed curriculum for a learning provider to follow there can be no assurances that all the learning providers are delivering the same learning outcomes, despite being accredited. As such, we are of the opinion that restricting the requirement to accredited courses only, reduces LAs flexibility as to which graduates, they choose to employ.

Question 3

Does the Competency Framework include:

- (a) all the relevant activities for the delivery of front-line official food and feed controls, other official activities and other activities related to these, whether carried out by LAs, PHAs and FSA delivery partners?
- (b) all the relevant activities for those working in the private sector who undertake assurance activities that are formally recognised to inform targeting/frequency of official controls?
- (c) the relevant competencies (knowledge and skills) for each activity and sub-activity?

What did stakeholders say?	What is the FSA's response?
<p>Stakeholders commented that the consultation on the Competency Framework is premature as it is still under development and the process for assessing competency has not been completed. For effective implementation of the Competency Framework, it is felt that the Competency Framework and the process of assessing competency should be considered together.</p>	<p>Having considered the feedback received we consider it appropriate to provide a transition period for the implementation of the Competency Framework.</p> <p>Existing authorised officers and RSOs, whose authorisation is not extended to new activities, will not have to have their competency assessed against the Competency Framework until the new approach to assessment has been determined.</p> <p>This transition period is described in section 3.1 of the Code.</p> <p>We have initiated work to consider the process for assessing competency under the Competency Framework and authorising individuals as competent and plan to consult on options for this in autumn 2021.</p>
<p>Further responses included:</p> <ul style="list-style-type: none"> • there must be a balance between assessment and work being done. 	<p>We acknowledge that the level of detail is greater than provided by the current Code, but the aim is to assist LFOs (or other competent authorised officers supporting the LFO assessment) in determining officer competency. The Competency Framework is activity based and each activity is designed to stand alone, so</p>

What did stakeholders say?	What is the FSA's response?
<ul style="list-style-type: none"> • there is no indication of timescales for further development or assurances that further developments will be subject of consultation. • that it is difficult to assess whether consistency will be improved as further development is needed. • that there is no rationale for including feed control activities in the Competency Framework at this time and feed officers may not have afforded time to this consultation. • concerns that the Competency Framework may not be met through the current allocation for training in the RSG. 	<p>an officer can be authorised to undertake one or multiple activities depending on their role. There is no expectation that an officer must be competent for all the activities within the framework.</p> <p>We will further develop the Competency Framework in due course in respect of official food controls and other activities undertaken by the FSA, FSA delivery partners and formally recognised private sector assurance activities, as necessary and consult on these.</p> <p>Implementation of the Competency Framework for feed controls delivered by LAs and PHAs, as well as controls undertaken by the FSA, FSA delivery partners and those undertaking recognised private sector assurance activities, is not planned until we have consulted on the review of the Feed Law Code of Practice and Feed Law Practice Guidance, which is anticipated to take place in autumn 2021. The reason for including competencies for feed controls at this stage is so that these competencies could also be consulted on during the recent consultation.</p> <p>The Practice Guidance provides a range of methods by which competency can be gained and demonstrated, for example by shadowing a competent officer, as well as successfully completing a training course. Completing a training course alone may not fully enable an officer to demonstrate all the competencies for a specific activity, for instance, an online</p>

What did stakeholders say?	What is the FSA's response?
	course may provide the required knowledge, and the skills will then be acquired through another method. LAs will also have the option of employing officers who are already appropriately trained.
Further details were requested in relation to specific food processes and products.	Detail about food processes and products, and specific specialist activities for the assessment of high-risk processes and products are included in section E: Specialist activities.
The transfer of individuals across public and private sectors already takes place and there is mutual recognition of qualifications for delivering official controls across the UK.	We recognise that individuals already move across the public and private sectors and across the UK. The aim of the Competency Framework is to further enable this by setting a single standard of competency, which when fully implemented will apply to all individuals engaged in delivering front-line official feed and food controls and formally recognised private sector assurance activities.
Further detail requested for Activity E1 - Operational Management, sub activities does not include 'undertaking competency assessments of officers.	<p>The Competency Framework does not include a specific sub-activity relating to assessment of officer competency. The reason for this is that we are currently reviewing the approach to competency assessment, and this will be considered as part of that review.</p> <p>LFOs who were competent to assess competency previously, will continue to be deemed competent. Training on assessing competency against the Competency Framework will be provided by the FSA.</p>

What did stakeholders say?	What is the FSA's response?
<p>Further detail requested for sub-activity B1.2 – lack of detail in relation to:</p> <ul style="list-style-type: none"> • traceability (and the specific requirements for particular products) • no reference to compositional standards 	<p>To be authorised to undertake sub-activity B1.2: Food standards inspections, an officer would need to demonstrate the competencies for A: Common competencies, B1: Inspecting businesses and B1.2: Food standards inspections.</p> <p>Traceability requirements and compositional standards are not referenced specifically in sub-activity B1.2: Food standards inspections, as these are legal requirements, knowledge of which is included in the A: Common competencies.</p> <p>If undertaking a food standards inspection, depending on the business being inspected, traceability and compliance with compositional standards could be included within the inspection, and the ability to assess these requirements would be included within the competencies for activity B1: Inspecting businesses. This activity includes the ability to, “conduct a risk-based inspection, making assessments about whether the business is complying with applicable legal requirements”.</p>
<p>Further detail requested for Activity B6 - consider composition in broad terms, which could lead to differences in interpretation.</p>	<p>With regards to composition, knowledge of compositional standards is included within the A: Common competencies, which requires knowledge and understanding of relevant legislation.</p> <p>Sub-activities B6.2: Assessing whether food is of the nature, substance or quality demanded by the consumer, and B6.3: Assessing product labelling and information, include the ability to determine whether foods, labelling, advertising, and other</p>

What did stakeholders say?	What is the FSA's response?
	<p>information comply with applicable legal requirements, which would include assessing compositional standards.</p> <p>It is recognised that full implementation of the Competency Framework is dependent on having a consistent approach to the assessment of competency. We have initiated work to consider the process for assessing competency, and plan to consult on options for this in autumn 2021.</p>
<p>Recommendation in relation to sub-activity B6.3 - scope of the activity is too broad and should be separated into further sub-activities i.e., general labelling requirements, product specific regulations, nutrition, and health claims.</p>	<p>With regards to sub-activity B6.3: Assessing product labelling and information, knowledge of food information requirements, product specific regulations and claims such as nutrition and health claims are covered by the A: Common competencies, which requires knowledge of relevant legislation.</p> <p>The description for sub-activity B6.3 has been amended to clarify that it covers both general and product specific requirements, as well as requirements relating to claims.</p>
<p>Recommendation in relation to sub-activity B5.1 - separating sampling activities for food hygiene, food standards and feed.</p>	<p>Sub-activity B5.1: Taking formal samples covers food hygiene, food standards and animal feed sampling. These were all included in this activity as separating these further would create further complexities and duplication within the Competency Framework.</p>

What did stakeholders say?	What is the FSA's response?
	<p>The competencies for sub-activity B5.1: Taking formal samples includes the ability to, “take risk-based representative samples in accordance with relevant policies, programmes, procedures, Feed or Food Law Code of Practice and Practice Guidance or Manual for Official Controls, including samples from online businesses”.</p>
<p>Recommendation in relation to sub-activity B1.4 - beneficial to include feed fraud and feed crime in addition to food fraud and food crime.</p>	<p>In line with the FSA's definition of food crime, detailed in 5.5.2 of the Code, the reference to 'food crime and food fraud' includes animal feed. The description of sub-activity B1.4: Feed inspections, and other relevant activities within the Competency Framework, have been amended to make this clear.</p>
<p>Recommendation in relation to sub-activity C1.1 and sub-activity D3.1 - activities to be combined as they are the same.</p>	<p>The Competency Framework is activity based and each activity has been developed to stand alone.</p> <p>It is recognised that Activity C1.1: Preparing investigation files, and D3.1: Preparing prosecution files, may be considered the same activity by some LAs due to how they prepare these types of files. However, for other LAs or other organisations in scope of the Competency Framework, this may not be the case, which is why they have been included as two separate sub-activities.</p> <p>If an LAs investigation file and prosecution file are the same, then an officer would be able to use preparation of the relevant file as evidence to demonstrate the competencies for both sub-activities.</p>

What did stakeholders say?	What is the FSA's response?
<p>Overview on feed interventions only references approved premises. It would be beneficial to consider adding registered premises with R codes.</p>	<p>The scope of the Competency Framework will cover both registered and approved feed premises. However, reference to feed registration codes has not been included, as knowledge of these would be covered by knowledge of the Feed Law Code of Practice which is one of the Common Competencies. The reason the approvals codes have been included is that they are included in the descriptions of the animal feed approval sub-activities, to clarify what each sub-activity covers.</p>
<p>There were concerns expressed that there is a disproportionate focus in the Competency Framework on food hygiene with little detail provided relating to food standards. For example, sub-activity B1.2, the majority of the section focuses on the ability to assess food safety management systems and quality assurance schemes.</p>	<p>To reduce duplication, the Competency Framework has been developed so that where possible activities can apply to food hygiene and food standards, as well as feed, for example activity B5: Sampling.</p> <p>Where necessary, specific sub-activities relating to food standards have been included, for example B1.2: Food standards inspections; B2.2: Food standards audits; B6.2: Assessing whether food is of the nature, substance or quality demanded by the consumer, and B6.3: Assessing product labelling and information.</p>
<p>One stakeholder felt that the imported food section was not detailed enough. A 'Yes/No' answer for the recording of competencies with no scope for evidencing how the decision was made was deemed inappropriate for this type of assessment.</p>	<p>With regards to import controls, the Competency Framework has been amended to include three relevant activities, to which additional details have been added.</p>

Question 4

Do you agree that by defining competency by activity rather than taking a role or profession-based approach this provides LAs, PHAs and FSA delivery partners with greater flexibility in the utilisation of resources? If not, why not?

What did stakeholders say?	What is the FSA's response?
<p>Some stakeholders agreed that defining competency by activity rather than role will provide greater flexibility.</p>	<p>Comments noted</p>
<p>Stakeholders commented that professionally qualified, holistic officers provide the greatest flexibility, as they can cover a wider remit and enable LAs to effectively adapt to changing circumstances. Defining competency by activity has the potential to diminish a highly skilled, professional workforce and can create difficulties for LAs to recruit into posts which have defined duties. Changing from a role-based approach will place an increased burden and level of responsibility on the existing skilled, professional workforce.</p>	<p>The Competency Framework is an activity-based framework which provides flexibility by allowing officers to be authorised for the activities they are competent to undertake.</p> <p>We recognise that each LA is different and that officers enforce legislation beyond food and feed. LAs can continue to recruit professionally qualified, holistic officers as they do currently, if they wish to do so. The proposed approach enables each LA to determine the requirements for the officers they are looking to recruit. If a LA requires an officer to work across all areas of environmental health or trading standards, then that LA may choose to recruit an individual with a qualification which includes these disciplines. Alternatively, if an LA requires an officer to undertake only official food controls, the proposed approach will enable that LA to be able to recruit with any of the 'suitable qualifications' listed in the proposed Code and authorise them for the specific activities they are competent to undertake. The FSA has broadened the current baseline qualifications and has not removed them.</p> <p>It will be for each LA to determine the requirements for the officers they are looking to recruit. If an officer is required to</p>

What did stakeholders say?	What is the FSA's response?
	<p>work across all areas of environmental health or trading standards, a LA may choose to recruit an individual with a qualification which includes these disciplines.</p> <p>Alternatively, if an officer is required to only undertake official food controls, a LA may recruit an officer with any of the 'suitable qualifications' listed in the proposed Code and authorise them for the specific activities they are competent to undertake.</p>
<p>Stakeholders in general did not agree that defining competency by activity was the best approach. They would prefer officers to possess qualifications which provide underlying knowledge as employing unqualified people would need more supervision. They feel that all the qualifications listed in the Code should be mapped to the Competency Framework and any gaps identified and addressed. This will ensure consistency and support lead food officers in the recruitment process.</p>	<p>The proposals still require officers to hold a qualification (except RSOs and officers undertaking controls on POAO at BCPs) and we have mapped those qualifications we anticipate being most commonly held by newly appointed officers against the Competency Framework, so it is clear how they align.</p> <p>Chartered Institute of Environmental Health (CIEH) have indicated that as far as possible, they will be aligning their new Advanced Professional Certificate in Food Hygiene and Standards Control (APC) qualification and the curriculum for the CIEH accredited degree courses to the Competency Framework. Chartered Trading Standards Institute (CTSI) have also indicated that they will be amending the Food Standards unit of their Trading Standards Practitioner Diploma to reflect the Competency Framework more closely.</p>

Question 5

Do you agree that by setting a standard that will apply to all individuals undertaking food and feed control activities, including assurance activities that are formally recognised, will improve the quality and consistency of delivery across the public and private sector? If not, why not?

What did stakeholders say?	What is the FSA's response?
<p>There was general agreement that all bodies providing assurance in relation to food and feed must be competent and setting a standard can provide confidence to both consumers and businesses.</p>	<p>Comment noted</p>
<p>Stakeholders commented that centrally produced competency frameworks do not exist for those providing control activities or assurance in other public or private sector and this should be a priority for the FSA as LAs already have a competency framework in place.</p> <p>There were also concerns expressed that the proposals will not improve quality or consistency. The responses included:</p> <ul style="list-style-type: none"> • the competencies within the current Code already establish a standard and no evidence has been provided as to what inconsistencies there are in the delivery of official controls and formally recognised assurance activities at present. • a consistent standard of competency for all relevant individuals can only be achieved through recognised qualifications. • there is likely to be variations in how Lead Food Officers make the assessment. 	<p>The Competency Framework has been developed to set a single and consistent standard that applies to all food and feed controls delivered by LAs, the FSA and FSA delivery partners, as well as those working in the private sector who undertake assurance activities that are formally recognised to inform targeting and frequency of official controls in Wales, England, and Northern Ireland. This single standard of competency does not currently exist.</p> <p>The reason the Competency Framework has been implemented for LA food controls is because of the amendments which have been made to the Code, including to the 'suitable qualification' requirements, which provide additional flexibilities to LAs. LAs already have an established method for assessing competency in place, and the decision was made to implement the Competency Framework using existing approaches to assessment initially. We are currently developing options for competency assessment and will be looking to implement the Competency Framework for other stakeholders within scope of the framework when the approach to assessment has been agreed.</p>

What did stakeholders say?	What is the FSA's response?
<ul style="list-style-type: none"> • those in the private sector will make use of the Competency Framework in assessing their own employees, for carrying out tasks through commercial agreements. • it is the consistent application of the standard which has the potential to deliver improvements not setting a standard. • the proposals will almost certainly lead to inconsistencies which is contrary to the stated aims. • no indication has been provided about who will be responsible for assessing competency in the private sector, how the competency assessments will be conducted and the safeguards that will be required to ensure independence. • LA interventions should not be replaced by third party auditing as this is a different process to official control delivery method. It is felt that such auditing could be used to inform LA work. 	<p>We recognise that the full implementation of the Competency Framework, which will apply to all individuals engaged in delivering front-line official food and feed controls and formally recognised private sector assurance activities, is dependent on having a consistent approach to the assessment of competency.</p> <p>We have initiated work to consider the process for assessing competency under the Competency Framework and authorising individuals as competent, which will include assessing the competency of individuals undertaking private sector assurance activities, and plan to consult on options for this in autumn 2021. Until that time the approach to competency assessment remains unchanged, with LFOs in LAs and PHAs still responsible for determining competency for officers, including contractors and agency staff.</p> <p>With regards to recognised qualifications the proposed amendments to the Code do not remove the requirement for officers to hold a 'suitable qualification' (except RSOs and officers undertaking controls on POAO at BCPs), which will have been assessed by an independent organisation.</p> <p>It is not the intention for third party auditing to replace LA interventions.</p>
<p>FSA should consider further that assurance related activities are different to delivering official controls and this should be reflected.</p>	<p>An additional sub-activity covering FSA approved assurance scheme audits has been added to better reflect the difference between the roles and responsibilities of enforcement authorities</p>

What did stakeholders say?	What is the FSA's response?
	and these schemes. This sub-activity will only apply to individuals undertaking FSA approved assurance scheme audits.
There is no information or date in the consultation documents relating to the current quality and consistency of delivery across the public and private sector. The case for change has not been made.	<p>The proposed policy changes are in response to the Code currently being restrictive rather than concerns relating to current quality and consistency of delivery of official food controls. The Code currently restricts LAs redeploying existing resources in a flexible way or employing newly qualified EHO's & Trading Standards Officers (TSOs) to carry out certain official controls and official activities.</p> <p>In relation to the Competency Framework, this has been developed to set a single and consistent standard that applies to all food and feed controls delivered by LAs, the FSA and FSA delivery partners, as well as those working in the private sector who undertake assurance activities that are formally recognised to inform targeting and frequency of official controls. This single standard of competency does not currently exist.</p>
One respondent stated that they felt these proposals have been rushed and poorly thought through and, in their opinion, would not deliver the dual objectives of quality and consistency.	Comments noted

Question 6

Do you foresee any problems with the provision to allow the FSA to be more responsive in issuing instructions, whereby LAs and PHAs may legitimately depart from the Code, in limited circumstances? If yes, what, if any safeguards or conflicts should we consider?

What did stakeholders say?	What is the FSA's response?
Some stakeholders supported this proposal and could see the benefits.	Comments noted
<p>Concerns were raised regarding the legal basis of the FSA 'instructing' LAs to depart from the Code.</p> <p>The potential impact on Council approved service plans, which set out the work programme for the year ahead together with resources required were also raised.</p> <p>The majority of stakeholders feel that such departures should be subject to independent scrutiny by the appropriate Minister, and this will ensure the accountability of the FSA. It is felt that requests of this nature should be accompanied by a robust case, which sets out the justification for departure.</p>	<p>We acknowledge the concerns raised and recommend removing the proposal to allow the FSA to be more responsive in issuing advice, whereby LAs and PHAs may legitimately depart from the Code, in limited circumstances. The FSA will consider this proposal further with Welsh Government officials and consider its inclusion and the wording during future reviews of the Code.</p>

Question 7

Do you agree that the key aspects of the OCR that have applied since the 14 December 2019 have been reflected, within the proposed Code and the Practice Guidance?

What did the stakeholders say?	What is the FSA's response?
There was agreement that the key aspects of the OCR have been reflected within the Code and Practice Guidance.	Comments noted
A concern was raised regarding the provision relating to sampling being moved from the Code to the Practice Guidance. It is feared that this may be viewed as a reduction in status for sampling and could result in a reduction in sampling budgets and rates.	A new Section 4.5 has been included in the Code reaffirming that food sampling and subsequent analysis, and examination performs an essential function, by providing intelligence and evidence on the safety and authenticity of food on the UK market, supporting enforcement action to protect consumers.

Question 8

Do you agree with our assessment of the impacts on LAs and PHAs, FSA approved assurance schemes, private sector assurance bodies, FSA delivery partners, and consumers, resulting from the proposed changes to the Code, the Practice Guidance, and implementation of the Competency Framework? Do you have any additional evidence to better understand the identified impacts? In particular, please indicate:

- (a) if you agree with our assumptions on familiarisation and dissemination time?
- (b) how long it currently takes to assess the competency of a newly appointed member of staff and the ongoing assessment of a member of staff already in post?
- (c) whether you foresee any changes in the assessment time, from the implementation of the Competency Framework?
- (d) how many new members of staff do you appoint every year?
- (e) whether you foresee changes to the number of new staff that need to be appointed every year?

What did the stakeholders say?	What is the FSA's response?
Some comments received were broadly supportive of the assessment.	Comments noted
Some stakeholders acknowledged that where officers hold a 'suitable' qualification which has been mapped against the Competency Framework, it was considered the competency assessment should not take a significant amount of time.	Comments noted
The majority of stakeholders generally considered the FSA had grossly underestimated the time for LAs and PHAs to familiarise themselves with the revisions to the Code, the Practice Guidance, and the Competency Framework. However, it was acknowledged that the colour coding scheme was welcomed in identifying proposed changes.	The familiarisation time was estimated in line with the Department for Business, Energy & Industrial Strategy (BEIS) guidance on the appraisal of new guidance , which is based on the average number of words a person can read per minute. This approach is consistent with that taken in other FSA consultations.

What did the stakeholders say?	What is the FSA's response?
<p>Further responses included:</p> <ul style="list-style-type: none"> • the lack of information on the expected costs to LAs or the impact of the proposals on the LA workforce • No information provided to support the claim that the proposals will not exceed £5m net direct cost to business • all officers will need to familiarise themselves with all the documents • the assessments will take substantially longer than they would currently, especially for officers who do not possess professional qualifications • the impact analysis should be reconsidered to determine how long it would take for each LA to assess each member of staff • No information provided regarding the lack of funding versus lack of suitable qualified officers • No clear information provided in relation to competency assessment for agency staff and contractors if they have one of the qualifications listed in the Code • FSA's assumptions on familiarisation and dissemination time would be best achieved for consistency and efficiency by an independent competent body through a qualification scheme 	<p>We have, however, reviewed our assumptions and recalculated the familiarisation costs:</p> <ul style="list-style-type: none"> • using the recently published 2019/20 LAEMS data • increasing the familiarisation time to take account of the additional amendments to the Competency Framework • applying the dissemination time to all food officers, and not just lead food officers • adding the cost for the provision of training to all lead officer <p>This resulted in the familiarisation costs rising from £4,995 to £10,167.</p> <p>Even with the revised estimate, a full regulatory impact assessment has not been produced for the updated Code. The reasons for this are:</p> <ul style="list-style-type: none"> • a number of the proposed amendments to the Code and the Practice Guidance take account of the implementation of Regulation (EU) 2017/625. The consultation on the Official Control Regulations (OCRs) in August 2019 included the impacts these regulations would have on LAs. It is therefore anticipated that LAs amended their policies and procedures following the introduction of OCR in December 2019. • When the Competency Framework is initially implemented for LA and PHA food controls, the existing

What did the stakeholders say?	What is the FSA's response?
	<p>methods of assessment set out in the Practice Guidance will be used, which minimises the impact of the proposals as they can continue to use their existing authorisation procedures. The difference is that the competencies to be assessed against are activity based, rather than being described by role as in the current Code.</p> <p>With regards to the anticipated time to assess competency against the Competency Framework, this will vary depending on individual circumstances.</p> <p>The Competency Framework is activity-based, and each activity is designed to stand alone, so an officer can be authorised to undertake one or multiple activities depending on their role. There is no expectation that an officer must be competent for all the activities within the framework.</p> <p>The proposals still require officers to hold a qualification (except RSOs and officers undertaking controls on POAO at BCPs) and we have mapped those qualifications we anticipate being most commonly held by newly appointed officers against the Competency Framework, so it is clear how they align.</p> <p>We have also provided a competency assessment record for LAs to use if they choose to. The record has been developed to enable the evidence for competency to be automatically logged against similar competencies in other activities, to reduce the time it takes to assess an officer's competency.</p>

What did the stakeholders say?	What is the FSA's response?
	<p>The approach to competency assessment has not changed and LFOs in LAs and PHAs are still responsible for determining the competency of officers, including contractors and agency staff.</p> <p>We recognise that modernising the baseline qualifications and implementing the Competency Framework do not in themselves resolve LA and PHA recruitment or funding issues. We are aware of these concerns and are currently involved in supporting LAs in raising this with Welsh Government.</p>
<p>The workforce survey commissioned by Safe, Sustainable, Authentic Food Wales (SSAFW) will provide information regarding the number of new members of staff appointed each year, however this does vary across the LAs.</p>	<p>We would welcome this work and look forward to its completion.</p>
<p>LAs anticipate that new staff will need to be appointed to the BCPs planned for Wales in 2021/22.</p>	<p>Comment noted</p>
<p>Stakeholders have refuted the comment regarding the benefit to consumers as this statement is not supported by evidence.</p>	<p>The modernisation of the baseline knowledge, skills and experience requirements and introduction of the Competency Framework will provide a consistent standard of competency and allow the more efficient allocation of resources, maximising the effectiveness of consumer protection provided by these controls.</p>

Question 9

Do you foresee any other impacts from the implementation of the main proposals detailed in paragraph 13 beyond what we have identified? Where possible, please explain your views and provide quantifiable evidence (for example, costs associated with updating existing templates, the benefits of greater flexibility to allocate staff to activities).

What did stakeholders say?	What is the FSA's response?
<p>Some comments received stated that they do not currently foresee any other impacts beyond those identified.</p>	<p>Comments noted</p>
<p>Comments provided by stakeholders regarding the potential impacts from the implementation of the main proposals included:</p> <ul style="list-style-type: none"> • Cost implications for LAs arising from additional training and the updating of policies and procedures • Lead officers would have a much greater burden to assess competency for new staff and to ensure that on-going competency is measured • LAs may need to employ more higher-level staff to cope • Risk of lead food officers seeking employment outside LAs • Officer ability to deliver official controls impacted because of the time spent in identifying and referencing evidence required to inform new competency assessments • Impacts of the proposals will be that the quality and consistency of Official Food Controls will be reduced, and those carrying out those Controls will not have a full appreciation of the purpose of those Controls. Without consistency, confidence, and trust from FBOs and consumers, regulation could be eroded and the FHRS scheme could be put in jeopardy. 	<p>The impacts of the proposals were considered in the consultation package and included familiarisation and dissemination costs.</p> <p>A number of the proposed amendments to the Code and the Practice Guidance take account of the implementation of Regulation (EU) 2017/625. The consultation on the Official Control Regulations (OCRs) in August 2019 included the impacts these regulations would have on LAs. It is therefore anticipated that LAs amended their policies and procedures following the introduction of OCR in December 2019.</p> <p>To quantify the number of officers required by LAs and PHAs, questions were included in the consultation pack to gather this data.</p> <p>The changes require that officers must still hold a 'suitable qualification' (except RSOs and officers undertaking controls on POAO at BCPs) and be subject to an appropriate competency assessment.</p>

What did stakeholders say?	What is the FSA's response?
	<p>When the Competency Framework is initially implemented for LA and PHA food controls, the existing methods of assessment set out in the Practice Guidance will be used, which minimises the impact of the proposals as they can continue to use their existing authorisation procedures. The difference is that the competencies to be assessed against are activity based, rather than being described by role as in the current Code. To assist with implementing the Competency Framework we will also be providing a competency assessment record for LAs and PHAs to use if they choose to. As they were previously, officers are encouraged to maintain a portfolio of evidence.</p> <p>In response to the consultation responses received, a transition period for the assessment of competency against the Competency Framework has been introduced - details are in Chapter 3 of the Food Law Code of Practice.</p> <p>This transition period means that a competency assessment against the Competency Framework will only be necessary:</p> <ul style="list-style-type: none"> • for officers, whose authorisation is dated on or after 1 July 2021 – who must be assessed against all the relevant activities in the Competency Framework that they are required to undertake; and • for existing officers (which includes regulatory support officers) who were authorised prior to this date, but whose authorisation needs to be extended to new activities on or after 1 July 2021 – who must be assessed against the new activities they will be undertaking.

What did stakeholders say?	What is the FSA's response?
	<ul style="list-style-type: none"> • If significant issues or concerns with an officer's competency are identified by the LA or PHA, a competency assessment against the relevant activities of concern within the Competency Framework, will be necessary.
<p>A stakeholder said that poor regulation and enforcement costs FBOs money. The incorrect enforcement approach such as inconsistent ratings, appeals, improvement notices, etc that are not legally required could be very costly and time consuming. This would also take the focus away from the FBOs normal activities and could have serious financial implications. Whilst larger FBOs may incur legal fees to challenge a decision that has been made incorrectly by a LA, this may not be possible for a smaller FBO.</p>	<p>Comments noted</p>

Other comments received

What did stakeholders say?	What is the FSA's response?
<p>Stakeholders' comments on the consultation document included:</p> <ul style="list-style-type: none"> • Consultees cannot be assured that the stated outcomes will be achieved as a suitable impact assessment has not been provided and key data is missing. • do not believe that the interdependencies that exist between the food workforce and other public health protection functions have been appreciated or acknowledged by the FSA. • did not feel the questions in the consultation were sufficiently focussed to obtain views on the potential impacts and unintended consequences of the proposals. • That not all key stakeholders were identified, such as Public Health Wales, Local Health Boards, and academics. 	<p>Please see question 9 above regarding impact assessments.</p> <p>It will be for each LA to determine the requirements for the officers they are looking to recruit.</p> <p>For example, if an officer is required to work across all areas of environmental health or trading standards, an LA may choose to recruit an individual with a qualification that includes these disciplines.</p> <p>Alternatively, if an officer is required to only undertake official food controls, a LA may recruit an officer with any of the 'suitable qualifications' listed in the Code and authorise them for the specific activities they are competent to undertake.</p> <p>Question 9 afforded LAs the opportunity to add comments to any other impacts from the implementation of the main proposals which they foresee.</p> <p>A full list of stakeholders informed of the consultation is detailed in Annex A.</p>
<p>Responses included data which evidenced that LAs are targeting their skilled people where they are needed. The data included:</p>	<p>The FSA acknowledge that LAs in Wales are consistently demonstrating a high performance of delivering food hygiene/standards interventions and are consistent in their approach. It is important to note that the proposed changes to the Code and the implementation of the Competency Framework are</p>

What did stakeholders say?	What is the FSA's response?
<ul style="list-style-type: none"> • the consistently high performance of delivering food hygiene interventions in Wales • the improvements of broadly compliant businesses in Wales • that officers in Wales are assessing food hygiene ratings consistently • high risk food standards interventions are being prioritised 	<p>not as a consequence of inconsistencies or poor performance. The widening of the 'suitable qualifications' and the implementation of the Competency Framework are to provide LAs with the flexibility to employ a wider cohort of environmental health and trading standards staff as well as developing a single and consistent standard that applies to all food and feed controls delivered by LAs and PHAs, the FSA and FSA delivery partners, as well as those working in the private sector who undertake assurance activities that are formally recognised to inform targeting and frequency of official food controls in Wales.</p>
<p>Stakeholders provided explanations on workstreams which are commencing in Wales, such as:</p> <ul style="list-style-type: none"> • the proposals for a level 4 Regulatory Compliance Officer apprenticeship, which will provide an additional route into food regulation for individuals interested in further development. FSA is welcomed as a key stakeholder in this work. • The review of the public health workforce, which is being led by Public Health Wales. 	<p>The proposed changes to the Code and the scope of the Competency Framework reflects the responsibilities of the FSA as a Central Competent Authority for food and feed and allows LA and PHA officers to be authorised for the type of interventions they are competent to undertake.</p> <p>The Regulatory Compliance Officer apprenticeship was discussed by a LA representative at SSAFW on the 1st February 2021. At the meeting it was acknowledged that its development was in its infancy and a piece of work would have to be undertaken to set the scene in terms of the need and how an apprenticeship will plug the gap to address the skills shortage within regulatory services. It was acknowledged that this will be a lengthy process.</p> <p>FSA were not listed as one of the 'interested parties' to the consultation of the review of the public health workforce in Wales, however we do acknowledge the review and recognise that there is</p>

What did stakeholders say?	What is the FSA's response?
	a proposal for more EHOs in general and not specifically food competent EHOs.
<p>Stakeholders provided responses on Border Control Posts (BCPs) in Wales, which consisted of:</p> <ul style="list-style-type: none"> • Recognition that a significant number of food competent officers will need to be recruited. • LAs who will have the BCPs are of the opinion that the proposed changes will almost certainly not provide the additional officer capacity required to deliver the necessary food controls. 	Existing BCPs in England and Northern Ireland have found the flexibility useful in employing officers to carry out their statutory functions.
<p>Stakeholders provided responses in relation to the need for co-production, which included:</p> <ul style="list-style-type: none"> • Reference to the communication to DPPW from the Cabinet Secretary for Health and Social Care in February 2018 setting out an expectation that Welsh LAs and the FSA work together to co-produce approaches • That SSAFW have not been involved in the development of the proposals in the consultation or provided with opportunity to co-produce solutions • That the longer-term impact of the proposals have not been developed in accordance with the principles of the Well-being of Future Generations (Wales) Act 2015 	<p>The FSA works in accordance with the principles and goals of the Well-being of Future Generations (Wales) Act, although it is not a named body in the Act.</p> <p>The Competency Reference Group (CRG) was set up initially in January 2019, to provide advice and guidance on the Competency Framework.</p> <p>In June 2019, an LA representative for Wales joined the group. At this stage, no decisions had been made on the structure and content of the Competency Framework. All group members were offered the opportunity to input any views on a draft of competency headings and on what the format/detail of the competency descriptors could look like.</p> <p>The draft Competency Framework was then produced taking account of the group's views and with insights and input from a</p>

What did stakeholders say?	What is the FSA's response?
	<p>large number of very experienced environmental health and trading standards professionals with LA backgrounds working across the FSA, including from Wales.</p> <p>The CRG were also provided with the opportunity to comment on the draft Competency Framework, which was further amended based on their feedback. The draft Competency Framework was sent to all stakeholders prior to the informal engagement events in October 2020.</p> <p>The CRG was established prior to the establishment of SSAFW and therefore existing mechanisms within Wales were used to ensure Welsh LAs were represented on the CRG.</p> <p>Recognising the pressures faced by LAs during the pandemic response, it was agreed with the Directors of Public Protection Wales (DPPW) that LAs would be supported in providing feedback to the proposals through a series of engagement events, individual meetings between FSA/LAs to provide comments. The FSA also and offered support to DPPW so that they could take on administrative resources and release competent food officers to focus on food controls and the COVID-19 pandemic.</p> <p>Feedback received from engagement events and through discussion with LAs has been included within the consultation and has been incorporated into the final documents.</p>
Other responses included that:	We recognise that these proposals to modernise the baseline qualifications and implement the Competency Framework do not in

What did stakeholders say?	What is the FSA's response?
<ul style="list-style-type: none"> • The proposals do not resolve the LA recruitment issue • guidance, support, and criteria for training courses are required from the FSA to ensure the proposals deliver both quality and consistency 	<p>themselves resolve the need for a sustainable approach to public protection workforce planning. The FSA is keen to support this work, led by LAs in Wales.</p> <p>A link to the LFO training has been included in the Smarter Communications letter as well as a Q&A. The training will assist LFOs in understanding the scope and structure of the Competency Framework and how competency is assessed.</p> <p>The FSA provides free e-learning courses for LAs and PHAs, as well as face to face training, where a need is identified. We will be developing a training strategy for LA training in future that will be aligned to the Competency Framework.</p>
<p>Duplication of sentence in Section 3.4.1 of the Food Law Practice Guidance.</p>	<p>Noted and amended</p>
<p>Request for FSA to explore with CIEH the development of a conversion course which will allow Port Health Officers to train to deliver the same official controls as vets. As there is a shortage of Official Veterinary Surgeons.</p>	<p>We have worked closely with the professional awarding bodies, including CIEH and CTSI when developing the Competency Framework and will continue to do so when developing the approach to assessment.</p> <p>The provision of Official Veterinarians undertaking inspection of live animals at BCPs, falls under the remit of Welsh Government. Local Authorities operating BCPs, must appointment Official Veterinarians to undertake the inspection of food products at a BCP. Before training can be considered, a change in legislation would be required to allow Port Health Officers to deliver official</p>

What did stakeholders say?	What is the FSA's response?
	controls that are currently undertaken by an Official Veterinary Surgeon at a BCP.
<p>Comments received feel that the FSA have assumed that:</p> <ul style="list-style-type: none"> • There are environmental health graduates currently employed in LAs who do not have the EHRB • There is a significant pool of environmental health graduates in Wales who want to work in LAs/BCPs • LAs/BCPs have the capacity to develop, mentor and supervise new officers as well as assess their competency 	<p>The proposals will attract Environmental Health graduates to apply for employment with LAs and allow LAs to employ and utilise them, which previously would not have been an option to graduates or the LA.</p> <p>LFOs in LAs are currently responsible for determining the competency of officers, including contractors.</p> <p>The Competency Framework will initially be implemented for LA and PHA food controls with the approach to assessing competency remaining the same as now, with competency being assessed against the Competency Framework rather than the Code. This means LAs can continue to use existing procedures for assessing competency. Section 3.6.2 of the Practice Guidance on 'CDP requirements' has been clarified.</p>

Actions to be implemented

The Food Law Code of Practice (Wales)

- Revised wording in Section 3.5 on the requirements for staff undertaking import controls at BCPs
- New Section 4.5 on sampling underpinning its importance and directing LAs and PHAs to further detailed guidance in Chapters 2 and 4 of the Practice Guidance
- Revised Section 4.6 on monitoring of consignments, providing clear links to the OCR requirements
- Minor editorial amendments

The Food Law Practice Guidance (Wales)

- Revised Section 3.4.5 to make clear that other competent authorised officers may assess competency and make recommendations to the LFO, but the decision to authorise remains solely that of the LFO
- New Section 3.4.7 added covering 'Officers moving from one Food Authority to another'
- Clarification made in Section 3.6.2 'CPD requirements' that A CPD year could be a calendar year or a rolling 12-month period
- Minor editorial amendments

The Competency Framework

- Improved clarity of specific wording
- Added a sub-activity covering FSA approved assurance scheme audits to better reflect the difference between the roles and responsibilities of enforcement authorities and these schemes
- Included additional details in the import control activities
- Implemented a transition period for assessment of ongoing competency against the Competency Framework for existing authorised officers and regulatory support officers, whose authorisation is not extended for new activities
- Included within relevant activities, the skill of being able to respond appropriately to unexpected circumstances and if required request assistance or gather relevant information to enable an appropriate response
- Amended description for activity B6.3: Assessing product labelling and information to clarify that it includes assessing general labelling and where applicable, product specific labelling and requirements relating to claims
- Additional text added to the following sub-activities to make clear definition of food crime includes animal feed:

- B1.4: Feed inspections;
- B2.4: Feed audits;
- C1.2: Investigating food fraud and food crime;
- E2.1: Import controls at points of entry.

Annex A

List of stakeholders who were consulted

1. A2Z Food Safety
2. Aberystwyth University
3. Agriculture and Horticulture Development Board (AHDB)
4. Associated British Ports
5. Blaenau Gwent County Borough Council
6. Bridgend County Borough Council
7. British Retail Consortium (BRC)
8. Caerphilly County Borough Council
9. Cardiff City Council
10. Cardiff Metropolitan University
11. Carmarthenshire County Council
12. Chartered Institute of Environmental Health (CIEH) Wales
13. City and County of Swansea
14. Conwy County Borough Council
15. Cyngor Gwynedd Council
16. Cyngor Sir Ceredigion County Council
17. Denbighshire County Council
18. Edwards of Conwy
19. Farmers' Union of Wales (FUW)
20. Federation of Small Businesses (FSB)
21. Flintshire County Council
22. Food and Drink Federation (FDF)
23. Food and Drink Wales Industry Board
24. Food Centre Wales
25. Food Standards Agency Wales (FSA)
26. Food Technology Centre (FTC)
27. Green Gourmet

28. Grŵp Llandrillo Menai
29. Hybu Cig Cymru – Meat Promotion Wales
30. Isle of Anglesey County Council
31. Merthyr Tydfil County Borough Council
32. Monmouthshire County Council
33. National Farmers' Union (NFU)
34. Nationwide Caterers Association (NCASS)
35. Neath Port Talbot County Borough Council
36. Newport City Council
37. Pembrokeshire County Council
38. Powys County Council
39. Public Health Wales (PHW)
40. Quality Welsh Food Certification Ltd (QWFC)
41. Rhondda Cynon Taf County Borough Council
42. Safe Sustainable Authentic Food (SSAFW)
43. The Nationwide Caterers Association (NCASS)
44. Torfaen County Borough Council
45. Trading Standards Wales (TSW)
46. UK Hospitality
47. Vale of Glamorgan Council
48. Wales NHS
49. Welsh Government
50. Welsh Lamb & Beef Producers (WLBP)
51. Welsh Local Government Association (WLGA)
52. Which?
53. Wrexham County Borough Council

Annex B

List of respondents

1. A2Z Food Safety
2. Blaenau Gwent County Borough Council
3. Caerphilly County Borough Council
4. Carmarthenshire County Council
5. Ceredigion County Council
6. Chartered Institute of Environmental Health (CIEH)
7. Chartered Trading Standards Institute (CTSI)
8. City and County of Swansea
9. Conwy County Borough Council
10. Denbighshire County Council
11. Directors of Public Protection Wales (DPPW)
12. Flintshire County Council
13. Gwynedd County Council
14. Isle of Anglesey County Council
15. Merthyr Tydfil County Borough Council
16. Monmouthshire County Council
17. Neath Port Talbot County Borough Council
18. Newport City Council
19. Pembrokeshire County Council
20. Powys County Council
21. Rhondda Cynon Taf County Borough Council
22. Royal Environmental Health Institute of Scotland (REHIS)
23. Scottish Food Safety Officer's Registration Board (SFSORB)
24. Shared Regulatory Services
25. Torfaen County Borough Council
26. Welsh Local Government Association (WLGA)
27. Wrexham County Borough Council

28. UK Hospitality

29. Individual Response

30. Other Respondent