



Review of the Food Law Code of Practice, Food Law Practice Guidance, and Implementation of the Competency Framework – England and Northern Ireland

Consultation Response

December 2020

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,000 members working in the public, private and third sectors, in 52 countries around the world. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

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Introduction

This consultation on proposals to amend the Food Law Code of Practice (the Code) and Food Law Practice Guidance (the Practice Guidance), in England and Northern Ireland (NI), and the FSAs new Competency Framework is of significant importance to CIEH and our professionals working to provide assurance and health protection around food safety and standards across the UK. Of particular significance is the proposal to introduce a Competency Framework which attempts to describe the competencies required for specific activities rather than take a role-based or profession-based approach.

CIEH and the Environmental Health Registration Board (EHRB), along with the Royal Environmental Health Institute of Scotland (REHIS) and the Scottish Food Safety Officers Registration Board, have been key to the establishment, development and ongoing awarding of the professional qualifications required to carry out food official controls in the UK and are the awarding bodies for the Environmental Health qualification. In the 1990s, in response to claims from businesses of inconsistencies in the application of food regulation, the Government identified a need for those carrying out food enforcement to hold a qualification which demonstrated skills and knowledge to an agreed consistent level and one which was independently awarded. As a result, specialist food qualifications were developed. Qualification as an environmental health practitioner through EHRB as well as the food safety officer qualifications, provide clear, evidenced qualifications which demonstrate the skills and knowledge officers hold. This is essential when providing advice and guidance to business and when taking enforcement action which may result in legal proceedings.

The skills involved in decision making to ensure an appropriate course of action and communicating these actions cannot be underestimated. The system of formal qualification, requiring independent assessment of academic knowledge and practical application of that knowledge ensures officers are competent.

When officers conduct interventions at food businesses they should be able to identify any significant risks, adopting a holistic approach but with a limited number of competencies there is an increased chance they will miss significant issues. The proposals have the potential to reduce consumer protection and impact on the excellent reputation of the UK at a time when our reputation as an independent nation will be more important than ever.

The absence of a robust impact assessment or cost benefit analysis is a significant cause for concern. The proposals have been developed with no evidence of a detailed assessment of workforce needs across the public sector.

CIEH is committed to working with the FSA and other key stakeholders to achieve shared outcomes, engaging people to protect consumer interests in relation to food.

About the submission

To inform this response, we have facilitated a number of engagement events with our members employed in the public, private and third sectors. We have also sought the views of:

- The CIEH Food Advisory Group
- Members of the National Food Hygiene Focus Group and National Focus Group for Food Standards and Information
- The Association of Port Health Authorities
- The Association of Chief Environmental Health Officers
- The Chartered Trading Standards Institute
- The Royal Environmental Health Institute of Scotland
- Representatives from Environmental Health Northern Ireland

Our response focuses on the aspects of the consultation of most concern to our members. We would have liked more time for further consultation with them on the detail contained in the Competency Framework and would respectfully request that where we have not commented it should not be taken that we do not have a view.

Following our meeting with FSA representatives on 3rd December, at which we were advised that comments received through the consultation process would be taken into account, we would welcome the opportunity to work with the FSA in taking this matter forward.

General comments

In advance of commenting on the proposals in the consultation and addressing the questions, it would be remiss not to highlight the concerns expressed by our members and the wider environmental health community. The timing of this consultation, in the midst of a pandemic is ill-conceived, when those most impacted by the changes i.e. local authority public protection services, are engaged on the front line, focusing their efforts in the fight against COVID-19, which has already claimed in excess of 60,000 lives across the UK. The timing, and limited time afforded for stakeholders to respond i.e. 18 working days between the formal launch of the consultation on 13 November and the deadline for responses of 10 December is wholly inadequate. At a recent CIEH engagement event, 88% of our members reported that there is insufficient time to consider all the proposals in the consultation, including the detail in the Competency Framework (in itself 100 pages). Further, 80% of our Port Health community, representing the workforce most likely to be impacted by the proposals in the short term, reported that as a consequence of the timing, they would not have the capacity to effectively engage.

The FSA has acknowledged the significant pressures on local authorities at the current time and facilitated two, one hour webinars in October and a further webinar in November aimed at individuals in the private sector, to advise of their proposals. Following

representations by the Directors of Public Protection in Wales, the consultation has not yet been launched in Wales. We understand a similar request was made by Environmental Health Northern Ireland (EHNI), the network representing local authority Heads of Service in NI. However, this we understand declined, and the consultation was launched there on 13 November with 18 working days for a response.

One of the consequences of such a limited window of opportunity to respond to the consultation is that local authorities are unlikely to have the opportunity to engage their elected members in the consultation process or seek member approval for their response.

The key question arising from any consultation is whether the changes proposed will secure the desired outcomes. Overall, the feedback we received from our members and the wider environmental health community is that the proposals are likely to present more challenges for the current food control system than they are likely to solve and that this may be a missed opportunity. There are concerns that the consultation is being rushed and that more innovative and sustainable solutions to solving current workforce challenges should be considered. The use of less qualified officers without a requirement for adequate supervision by suitably qualified, experienced officers, the lack of professional assessment, and the potential for inconsistencies in the assessment of competence by local authorities, Port Health Authorities and others implementing the Competency framework, all have the potential to impact on public health, consumer confidence and businesses.

The need for appropriate mentoring and supervision of officers who are not qualified, particularly at Ports, has not been acknowledged in the Code of Practice, Practice Guidance or the Competency Framework. This will be essential in developing the workforce for the future.

Austerity has had a disproportionate impact on local authority public protection services in England. Even if there was a plentiful supply of suitably trained and competent officers, there is evidence that some local authorities may not have the budget to recruit the additional officers they need. There is no data provided in the consultation to quantify the gap between the existing workforce and the workforce that is required now and in the future. The cost of regulation was identified as part of the FSAs Regulating our Future programme some five years ago and work to explore a more sustainable funding model not completed. The proposals in the consultation do not address this, and there are now calls for the FSA to explore a more sustainable funding mechanism for the delivery of independent food official controls by local authorities. The additional work associated with implementing the new Competency Framework will place more pressure on already stretched resources. 70% of our Port Health community told us in a poll that they will not have the capacity to carry out the required competency assessments of officers, at the same time as responding to the challenges and increased demands arising from EU exit.

Questions asked in this consultation.

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?

The layout and presentation of the Code and Practice Guidance is a secondary consideration and should be considered when there is consensus on the content.

We have no significant comments to make on the layout /presentation of the proposed Code and the Practice Guidance at this stage. They are lengthy documents. Our main concern is that authorised officers who are required to read and understand the documents, with current pressures, are not afforded sufficient time for familiarisation.

2. Do you agree that the proposed suitable qualification requirements provide LAs and PHAs 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).

While the proposed suitable qualification requirements will allow a wider cohort of professionals to undertake food control activities which the Code currently restricts, it will not necessarily provide local authorities or Port Health Authorities with the ability to deploy current resources more efficiently. In the short and medium term, the proposals will mean that existing local authority and Port Health officers who are qualified and experienced will be required to spend more time developing, mentoring, supervising and assessing the competency of these officers. There are risks associated with not implementing effective development/mentoring plans. So, in summary, the proposals are unlikely to deliver a more efficient or effective service in the short or medium term.

There is no data provided in the consultation on the likely or desired impact of the proposals on the workforce and no attempt has been made to quantify the number of additional officers that may be required in LAs or PHAs. An estimate of the number of new graduates that may be available to work in LAs and PHAs in England and NI would be useful. The number is likely to be limited and for this reason there is a call from our members to enable local authorities to 'grow their own' by employing staff at lower level than graduate and developing them along a professional pathway.

In respect of individuals with a degree or MSc in environmental health, it is noted that there is no requirement for the degree/MSc to be accredited. Accreditation by CIEH ensures consistency in course content and assurances around the quality of provision. 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 and, except for graduates from the University of Ulster who complete their

third year on a work placement, may not have any experience of applying their knowledge in a work setting. Further, these graduates will not have been subject to an independent assessment of their competency. Concerns have been expressed by our members and wider stakeholders that this undermines the professional status of the food officer role and is not consistent with the CIEH position that those delivering official controls should be subject to an independent assessment of their competence.

We launched our Competency Development Portfolio (CDP) in June 2020, which includes a professional interview and provides a framework for new graduates to demonstrate their competency. It is aligned to the competencies in the current Code of Practice. Individuals completing the Higher Certificate in Food Control and the CIEH new Advanced Professional Certificate (APC) in Food will be required to complete the CDP so there is a clear anomaly in including the environmental health degree/MSc in the list of suitable qualifications without the CDP or a requirement for these individuals to be working towards the CDP. In respect of environmental health practitioners, we therefore suggest that a more equitable and consistent approach in the Code would be to require individuals to be registered with EHRB (or its replacement) and/or possess a degree/MSc in Environmental health with the CDP. The CDP provides a structured approach to officer development and independent verification of competency. Recent CIEH engagement with employers in the public and private sectors confirmed their support for independent verification of officer competencies by a professional body.

In respect of Port Health particularly, where unqualified staff may now be employed, there are no proposals in the consultation to differentiate the tasks that can be undertaken by qualified and experienced staff from those that can be delivered by unqualified staff. This undermines the professional qualification of environmental health practitioners and in the longer term is likely to impact on pay and reward. A shift in the workforce to more unqualified officers has the potential for more inconsistent regulation and to impact public health.

A solution suggested by our Port Health community, which we would endorse, is to adopt the approach set aside for Official Veterinarians whereby, professionally qualified and competent Port Health Officers make significant decisions on the acceptance or rejection of imported food. Staff with lower level qualifications or no qualifications should work under the supervision of these officers. This will enable additional officers to be brought into the system without impacting negatively on food safety or public health. It will also provide the safeguards local authorities require when their enforcement decisions are called into question in the face of legal challenge. The importance of sound judgements by professional officers, following due processes, cannot be underestimated. The value of import consignments and the risks to Port Health Authorities are too great for compromise on this matter. Officers must be able to demonstrate their credibility in a Court of law and successful challenge on a consignment could have serious cost implications for the authority.

This principle should also apply to local authorities, with significant enforcement decisions only being taken by suitably qualified, and experienced professional officers. We have concerns at the proposal that officers who do not have a relevant qualification, that

demonstrates they possess the underlying knowledge, make significant decisions which have the potential for substantial impact on businesses and, if the decision is subsequently found to be wrong, the consequential costs to local authorities.

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 subactivity? If not, what changes would you wish to see, and why?

No. We have been advised by our Port Health community that the imported food section particularly needs to be more detailed to cover all relevant activities, hazards and means of presentation, assessment and sampling of foodstuffs.

A requirement for the evidence considered as part of the competency assessment to be referenced should be included to avoid the competency assessment becoming a Yes/No box ticking exercise. We have serious reservations, as do our members and other stakeholders, about the potential for inconsistency in the assessment of competence by local authorities and Port Health Authorities and it is disappointing that the Competency Framework has been presented for consultation in advance of work being completed to consider consistency which we are informed will be the subject of a further consultation in April 2021. The absence of guidance significantly increases the risks of inconsistency.

Overall, our members advised that they require significantly more time to consider the detail in the Competency Framework. If more time is afforded, it would be our intention to facilitate focus groups with members to inform a detailed response. The FSAs stated ambition for LAs and PHAs to implement the Framework from February 2021 is unreasonable bearing in mind other pressures associated with the pandemic, the fact that there is still development work to be completed so it can be used in the private sector and the work on consistency is not going to be completed until April 2021.

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?

No. Local authorities have advised that professionally qualified holistic officers provide them with the most flexibility whether it be environmental health officers or trading standards officers able to work across several disciplines. They have also advised that they provide greater value in terms of public protection. Their flexibility, being deployed to new and different activities during the current pandemic evidences this.

There are also many excellent officers with a food qualification such as the Higher Certificate in Food Control who currently deliver the full range of food official controls. These officers reduce burdens on businesses as they have the ability to provide wide

ranging advice and consider a range of requirements during the same intervention. It is not as cost effective for local authorities to employ officers with a narrower focus or in the interest of businesses.

The issue is more complex than the consultation suggests. It is one of funding for local authorities, limited availability and access to standalone food qualifications such as the Higher Certificate in Food Control, and a shortage of suitably qualified officers. There is a real risk that the proposals will weaken the health protection system across the UK, and at such a critical time, reducing qualification requirements is in our view ill advised.

An unintended consequence of the proposals is that at Ports there will be pressures to employ unqualified staff which, since amendments were made to the Trade in Animals and related Products Regulations in 2019, will be permitted. Over time the workforce could transform to one of largely unqualified officers. This is not in the interest of health protection and therefore public health. It is also likely to impact on pay and reward meaning qualified officers may seek employment elsewhere. Were this to happen, this would further challenge workforce capacity rather than provide solutions.

Notwithstanding the above, we acknowledge that workforce capacity is an issue which needs to be addressed and there is the potential to increase capacity using unqualified staff, but they must be suitably supervised by those who are both qualified and experienced. There should also be a career pathway for these unqualified staff so they are able to obtain professional qualifications over time. This will provide for a more sustainable workforce in the longer term.

CIEH has launched a campaign #ChooseEnvironmentalHealth to encourage more individuals into the profession and a register of professionals Environmental Health Together to assist local authorities with recruitment during the current crisis.

5. Do you agree that 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?

There is no information or data in the consultation documents relating to the current quality and consistency of delivery across the public and private sector. The case for change has therefore not been made. The absence of this information means that if the proposals are implemented, it will not be possible to assess the impact of the changes.

Our members in the public and private sectors acknowledge the value of private assurance activities and, overall, are of the view that they should inform not replace independent assessments of compliance by local authorities.

A single standard should apply through the qualifications route, not the proposed method of competency assessment by LAs or individual bodies. The proposal will almost certainly lead to inconsistencies which is contrary to the intentions.

The FSA states in the consultation that the Competency Framework will apply to all individuals engaged in food and feed law related activities whether carried out by LAs, PHAs, FSA, FSA delivery partners or those working in the private sector undertaking assurance activities. However, it would appear that the document is incomplete as it later states that the FSA 'will further develop the Competency Framework to cover private sector assurance activities, official controls undertaken by the FSA, FSA delivery partners, and for feed controls delivered by LAs and PHAs'. The question therefore arises as to whether consultation on the Competency Framework is premature. It is not possible to agree that the standard will improve quality and consistency of delivery across the public and private sector when it is not complete. Further, whilst the FSA recognises the need for a consistent approach to the assessment of competency, work commissioned to research how other regulators (both nationally and internationally) and other organisations assess and authorise competency has not been completed. Options for the assessment of competency will be the subject of further consultation in April 2021. Yet implementation of the Competency Framework is expected by LAs and PHAs in February 2021. No implementation date has been provided for other bodies.

As a consequence of i) the further work needed on the Competency Framework to cover sectors other than LAs or PHAs, ii) the ongoing work around assessment of competency which is scheduled for completion in April 2021 and iii) that to demonstrate improvements in quality and consistency some baseline data/information is required, we would respectfully request that the deadline for comments on the Competency Framework is extended until after April 2021 when all work on the Competency Framework has been completed. Stakeholders will then be better informed to respond to this 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?

Yes. Whilst CIEH understands the need for departure from the Code, such departures have the potential to impact not just on LAs and PHAs, but they also have the potential to impact on businesses and consumers. Such departures should therefore be subject to independent scrutiny by the appropriate Minister. This ensures the accountability of the FSA. Requests for Ministerial approval for departure from the statutory Code should be accompanied by a robust analysis of the risks, costs and benefits to LAs/PHAs, businesses and consumers.

Local authorities are themselves legal entities accountable to democratically elected members. In accordance with the Framework Agreement, in some local authorities elected members formally approve annual food service delivery plans which set out the work plan for the year ahead together with the resources required to deliver the plans. Departure from the Code has the potential to impact on the delivery of annual service plans. The FSA does not employ or fund local authorities and it is therefore questionable whether it is appropriate for them to 'instruct' a departure from a statutory Code, which has previously

been subject to Ministerial approval, or a Service Plan developed in accordance with the Code, which may have been approved by democratically elected members without this independent Ministerial scrutiny.

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

No comments

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?

No.

There is no regulatory impact or cost benefit analysis included in the consultation which is a significant omission. Further there is no information provided to support the claim that the proposals will not exceed £5m net direct cost to business.

Costs to local authorities

No costs have been provided. Further, no attempt has been made to quantify the likely impact on the local authority food control workforce of enabling a wider cohort of local authority professionals to undertake official food controls and other official activities, which the current Code restricts. This is a serious and significant omission. During a CIEH engagement event with members, when asked in a poll whether they thought the proposals in the consultation will solve the problems local authorities are experiencing in recruiting food officers, 79% said no, only 8% said yes and 13% said they don't know. In a similar poll of our Port Health community 27% said yes, 60% said no and 13% said they don't know.

In respect of local authorities and Port Health Authorities, it has been estimated that one Environmental Health Officer and One Trading Standards Officer per local authority and one manager at each Port Health Authority will need to familiarise themselves with the revisions to the Code, the Practice Guidance and the Competency Framework. We would expect **all** authorised officers to familiarise themselves with revisions to the Code, the Practice Guidance and the Competency Framework. Indeed, one of the common competencies in the new Competency Framework is for officers to have *knowledge and understanding of relevant legislation, codes of practice, guidance, policies and procedures*.

The consultation document states that officers will need three hours to read and familiarise themselves with the changes and two hours to prepare and disseminate the information to staff. In view of the volume of material associated with the consultation, this is likely to be a significant underestimate. The consultation document itself consists 46 pages, the

Competency Framework 100 pages, the Code of Practice 88 pages and the Practice Guidance 244 pages.

On the basis that officers' competencies currently need to be re-assessed on an on-going basis, it has been stated in the consultation document that no additional burden is introduced in implementing the new Competency Framework. There is a contradiction later in the same paragraph stating that it 'might take longer'. Feedback from our members, and in particular lead officers, is that the new competency assessments are likely to take substantially longer and that this is a significant additional burden on already stretched local authority resources. Further, the proposal in the consultation which will enable local authorities to authorise a wider range of officers i.e. those who do not possess professional qualifications is almost certainly going to increase the time it takes to undertake the assessment of competence. We would urge local authorities and Port Health Authorities to attempt to quantify this additional burden and provide feedback to the FSA.

Costs to FSA approved assurance schemes, private sector assurance bodies and FSA delivery partners

Although the FSA states that the Competency Framework when fully implemented will also apply to those working in the private sector who undertake assurance activities that are formally recognised and those official control activities undertaken by FSA delivery partners, no costs or timescales have been provided. Further, 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.

Benefits to consumers

It is claimed in the consultation that the changes to 'the baseline knowledge skills and experience requirements and introduction of the Competency Framework will improve the quality and consistency of food control activities meaning consumers will benefit from enhanced consumer protection through more efficient allocation of resources, maximising the effectiveness of consumer protection provided by these controls'. This statement is not supported by any evidence and it is difficult to envisage how this will be measured. There is no supporting information provided in the consultation documents about current quality and consistency of food control activities in the local authority sector. Our engagement with members and other stakeholders identified concerns that the changes could have the effect of reducing quality and consistency. For example, in respect of individuals with a degree in environmental health, the removal of the requirement for a professional qualification, with independent verification of officer competencies and its replacement with the assessment of competency by employers has the potential to reduce consistency. Also extending the duties of officers who do not hold a relevant qualification e.g. allowing officers with an Ordinary Certificate in Food Premises Inspection to make judgements about food, including seizing and detaining food has the potential to compromise consumer protection.

Benefits to local authorities

The consultation states that the amendments to the Code will enable local authorities and Port Health Authorities to recruit from a wider range of officers and use their resources more efficiently to maximise the effectiveness of consumer protection provided by their controls, and this will be specifically useful at points of entry for imported foods. Whilst it is accepted that the proposals have the potential to boost workforce capacity, although not solve the current workforce crisis, particularly at Ports, we are concerned that the need for increased supervision when deploying less qualified officers (or unqualified officers in the case of fish inspectors), has not been acknowledged. There will be a significant burden on existing qualified officers, particularly at the Ports, developing and mentoring new officers which needs to be reflected in the Competency Framework. It is likely that a significant proportion of qualified and experienced officer's time could be spent developing and mentoring others.

Feedback from members, particularly those that are lead officers, identified the need for them to be able to authorise officers at a lower level than is currently the case so they can 'grow their own'. These officers would require significant supervision and their authorisations would be very limited but there is support for a career path for such individuals which includes lower level professional qualifications.

Any benefits to local authorities will only be realised if there is sufficient funding available at a local level to employ the additional officers required. No information has been included in the consultation setting out the relative contribution of lack of funding versus lack of suitably qualified officers to the current shortfalls in the workforce. Further, the shortfall in local authority and Port Health Authority workforce capacity has not been quantified in the consultation documents. This will make it difficult to assess the impact of the proposed changes if they are implemented.

Funding for local authority food controls is a key consideration. Local authority services in England have been particularly hard hit by austerity and our members are not optimistic about the future. One of the principles of the FSAs Regulating Our Future Programme was that businesses should meet the costs of regulation. Work to explore a more sustainable funding model for local authority food controls is therefore more urgent than ever.

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?

Assumptions on familiarisation and dissemination time have been significantly underestimated at three hours and two hours respectively having regard to the volume of material associated with this consultation. Further, all authorised officers will need to

familiarise themselves with the amended Code of Practice and Practice Guidance not just one per local authority for food hygiene and one for food standards.

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?

Local authorities and Port Health Authorities are best placed to comment.

c. whether you foresee any changes in the assessment time, from the implementation of the Competency Framework?

Local authorities and Port Health Authorities are best placed to comment.

d. how many new members of staff do you appoint every year?

Local authorities and Port Health Authorities are best placed to comment.

e. whether you foresee changes to the number of new staff that need to be appointed every year?

Local authorities and Port Health Authorities are best placed to comment.

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).

Yes.

That the consultation will not achieve the desired outcomes. A number of assumptions have been made:

- That there are environmental health graduates currently employed in local authorities who do not have EHRB who will be deployed to food work. This may not be the case. There is no information in the consultation document indicating that any work has been done to explore this.
- That there is a significant pool of new environmental health graduates in England who want to work in LAs/PHAs. Increasingly graduates are seeking employment in other sectors.
- That LAs/PHAs have the capacity to develop, mentor and supervise new officers as well as assess their competency.

Changes to those who can provide assurance on food could have the potential to impact on international trade for which consultation on the impacts on international trade may be required.

There is a matter which we would like to explore with the FSA in connection with the Official Veterinarian role which is 'protected' under the Code for Product of Animal Origin Imports which is both incompatible with the rest of the Code and the wording of the OCR that the Code purports to follow. Given that there is a shortage of UK Official Veterinary Surgeons (note: NOT Official Veterinarians as there is no qualification listed in the OCR), this matter should be considered in parallel as future recruitment from abroad will pose other challenges to Port Health Authorities. For the purposes of imported food controls, we would like to explore the development of a conversion course which will allow Port Health Officers to train to deliver the same food official controls as vets. Our members have advised, and we agree that many Port Health Officers will be competent to deliver these.