

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

Status: Open

Date launched: 24 February 2025

Closing date: 19 May 2025

This consultation will be of most interest to:?

- Competent Authorities - District Councils
- Food businesses?and industry trade bodies
- Awarding bodies for environmental health professionals??
- Trade unions and expert groups may also have an interest?

Consultation subject

The Code sets out instructions and criteria to which District Councils in Northern Ireland must have regard when discharging their duties in relation to the delivery of official food control activities. The Code requires regular review and revision to ensure that it reflects current priorities, policy and legislative requirements so that the delivery of food control activities remain effective, consistent and proportionate. The FSA is required to consult on proposed amendments to the Code.

Purpose of this consultation

This consultation seeks stakeholders' views on proposed changes to the Northern Ireland Code and Practice Guidance. The key proposals include:

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

Consultation pack

Northern Ireland

PDF

[View Consultation Pack - Food Law Code of Practice \(Northern Ireland\) as PDF\(Open in a new window\)](#) (699.92 KB)

Northern Ireland

PDF

[View Draft Food Law Code of Practice \(Northern Ireland\) as PDF\(Open in a new window\)](#) (1.06 MB)

Northern Ireland

PDF

[View Draft Food Law Practice Guidance \(Northern Ireland\) as PDF\(Open in a new window\)](#) (2.12 MB)

How to respond

Please use the consultation response form to provide your comments. The form should then be emailed to CodeReviewResponses@food.gov.uk

Northern Ireland

WORD

[View Food Law Code Consultation Response Form - Northern Ireland as Word\(Open in a new window\)](#) (59.63 KB)

Parallel consultations are also being undertaken in [England](#) and [Wales](#).

Publication of response summary

Within three months of a consultation ending we aim to publish a summary of responses received and provide a link to it from this page.

You can find information on how we handle data provided in response to consultations in our [Consultations privacy notice](#).

Further information

This consultation has been prepared in accordance with [HM Government Consultation Principles](#). If an Impact Assessment has been produced, this is included in the consultation documents. If no Impact Assessment has been provided, the reason will be given in the consultation document.

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

Questions in relation to proposals 1 to 6

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

Question 1a. Do you consider that the approach will provide Competent Authorities with the ability to deploy current resources more effectively? If not, why not? (Please specify any aspects of the proposal which requires further consideration, and why).

Mid Ulster District Council acknowledges the introduction of the flexibility regarding the timescales for initial official controls of new food businesses. Mid Ulster District Council agrees that this will enable Councils to prioritise initial or due official controls of higher risk premises.

Although the Code provides for an initial official control for lower inherent risk businesses within 3 months of commencing operations the FSA should be aware that Councils will be pressured in providing businesses which are included in Food Hygiene Rating Scheme (FHRS) with a rating in a shorter time scale for commercial reasons.

The business types that Councils can avail of remote official controls would be limited to those that are low risk and exempt under the FHRS such as childminders, chemists, certain off licences and food brokers. Within the Mid Ulster District Council area, the number of these types of businesses is low, and they do not frequently change ownership, therefore it is limited as to officer time saved.

Mid Ulster District Council would consider a 'competent person' to be one who meets the qualifications in the current Food Law Code of Practice (FLCOP). While unqualified staff may be able to gather information a suitably qualified person, as per the FLCOP, will be required to make the inherent risk assessment.

Currently the Council's Management Information System (MIS) is not set up to accept an initial desktop inherent risk assessment, therefore, further development of the MIS system is required to input data and to extract data. Currently data in respect of the initial risk assessment would not be able to be retrieved or reported upon.

Our current MIS defaults to 28 days for a planned initial official control on acceptance of a food registration. The proposal to introduce an initial desktop assessment to provide an inherent risk will require additional administration time. Without the appropriate adaptations to the MIS, clarity is sought on how this should be recorded.

Due to limited information being provided through Register a Food Business (RaFB) at the time of registration, it will be necessary to contact businesses to clarify all three elements to accurately assess the "potential hazard". This will require

additional staff resources. The FSA should consider developing additional mandatory fields in RAFB to capture the necessary business information for both Food Hygiene and Food Standards.

There is no confirmation in the consultation that the FSA will cover the costs of the necessary future development of the MIS.

Mid Ulster District Council believes that the introduction of a permit to trade system would be more effective than focussing on changing the approach to initial inspections after registration.

Question 1b. It is proposed that, for food hygiene, timescales are provided for initial official controls of all establishments. For food standards, timescales are currently only provided for the highest risk establishments in the Code, with timescales for lower risk establishments provided in separate guidance. Would you agree or disagree with moving the food standards timescales into the Code in the future, so all timescales are in one document? Please describe the main reasons for your answer.

Mid Ulster District Council disagrees with moving the food standards low risk establishments timescales into the Code. Retaining the low-risk Food Standard timescales in the Practice Guidance (PG) will provide Councils with the flexibility to use their resources effectively and make their inspection programme more efficient. Where there may be different risks associated with food hygiene and food standards at the same premises then Councils will be better able to manage their inspection programmes based on highest risk and priority. Low risk food standards inspections will be carried out at the time of the due food hygiene inspection.

Question 1c. Proposal 1 relates to the timescales for initial official controls. No changes to the timescales for due official controls are proposed as part of this consultation, these will remain, as currently, at 28 days for all establishments. However, to assist us in planning future policy in relation to the timescales for due official controls, do you agree or disagree with keeping the timescales at 28 days? Please describe the main reasons for your answer.

Mid Ulster District Council agrees that 28 days should be retained as we do not believe there is a benefit in introducing an additional time frame of 3 months as this will add complications and be difficult to monitor.

Mid Ulster District Council will always aim to undertake inspections of higher risk premises, i.e. A, B and C's, within 28 days of inspection and prioritise inspections based on risk. Introducing an additional time frame for lower risk premises will not change the risk-based approach to inspection planning, as lower risk inspections will be undertaken as resources permit, considering all other competing food safety priorities.

In relation to proposal 2, enabling, in certain circumstances, an establishments food hygiene intervention rating to be amended following a wider range of official control method and techniques including those undertaken remotely:

Question 2a. Do you consider that the proposal will enable Competent Authorities to deploy current resources more effectively? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council acknowledge the benefits of the proposed flexibilities for undertaking official controls, however, the operation of the mandatory FHRs in Northern Ireland limits their use. In order to maintain consumer confidence in the integrity of the FHRs scheme, it is not a viable option to make use of other official controls in broadly compliant C and D premises as an inspection is always required to determine the rating.

The proposal recognises that establishments within scope of the FHRs can avail of a non-official control which can be undertaken remotely, but the rating cannot be revised. Mid Ulster District Council does not agree with this proposal as this would diminish the consumer confidence when it comes to light that premises are legitimately displaying ratings that were issued 3 or 4 years prior.

With lessons learnt during the Covid 19 pandemic, the lack of physical inspections by Environmental Health Officers resulted in a decline in food safety standards, including in those premises previously deemed to be in a lower inherent risk category e.g. Category D premises. Mid Ulster District Council found that remote assessments were not a suitable means for applying official controls on their own and could only be used to assist a physical inspection, rather than a means to adequately risk rate the premises.

Consumers have a view that FHRs rating inspections are carried out at much shorter intervals, this is supported by FSA consumer research which indicates consumers would expect businesses to receive inspection regularly with expectations ranging from a few times a year to every two years.

<https://www.food.gov.uk/research/value-of-fhrs-consumer-research-executive-summary>

There may be scope to develop the use of partial inspections by qualified officers. They are currently seldom used but may save time and still enable a revised risk rating and FHRs rating to be issued. In order to issue a revised rating all three elements of the FHRs scoring would need to be assessed therefore the feasibility of partial inspections would need to be explored further.

There may be inconsistency of approach to official controls between the 3 nations. England does not operate the mandatory FHRs scheme and has the flexibility to avail of a wider range of official controls, including remote assessment.

Mid Ulster District Council agrees with the proposed approach to E Category establishments, where currently an Alternative Enforcement Strategy can be utilised; the proposal enables Councils to alternate to non-official controls. This proposal would save officer time carrying out follow up activities on non-returned Alternative Enforcement Strategy (AES) questionnaires.

The proposed flexibilities descriptors should be more concise.

Question 2b. If responding on behalf of a Competent Authorities, would you, if implemented, utilise the flexibility to undertake some methods and techniques remotely? If not, why not?

Mid Ulster District Council does not agree to the use of remote inspections for C and D establishments. Previous experience of officers at Mid Ulster District Council found that remote assessments were not a suitable means for applying official controls and could only be used to assist a physical inspection rather than a means to adequately risk assess the premises. The time required to set up a remote assessment with the FBO was often found to be equivalent to carrying out a physical official control. In addition, a lot of small businesses do not have the technical ability to facilitate a remote intervention.

Mid Ulster District Council believes in person visits remain the most effective means by which to undertake an official control and would only consider using remote interventions for E category establishments which fall outside the FHRS, or for the verification of work carried out by a business following a physical inspection.

In relation to proposal 3, extending the activities that officers, who do not hold a 'suitable qualification' for food hygiene or food standards, can, if competent, undertake:

Question 3a. Do you consider that the flexibilities will enable Competent Authorities to deploy resources more effectively? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council does not agree with the utilisation of officers not holding a suitable qualification to undertake official controls for food hygiene in D and E premises and food standards in lower risk food standards premises. Official controls should remain within the remit of suitably qualified staff. The oversight and supervision required by competent officers and lead officers would negate any advantage to the Council.

On page 19 of the consultation document, there is recognition of the fact that Local Authority Officers may undertake food related controls at the "same time as other regulatory activities". We wish to emphasise the point that small businesses benefit from a single officer being able to act as a point of contact or source of advice on different pieces of legislation. Whilst some of the other "regulatory activities" may fall outside of the scope of the FSA, suitably qualified officers are well placed to take a holistic and business-responsive approach, using their discretion and expertise to judge risk.

In addition, the current MIS does not allow the extraction of data based on specific risk scores and it would therefore not be possible to determine which Cat D premises have a 5 or 10 for type of food/method of handling rendering this proposal impracticable.

In addition, please also see response to question 1 of **Questions in relation to future potential developments – Qualifications.**

Question 3b. If responding on behalf of a Competent Authorities, would you, if implemented, utilise this flexibility and authorise officers, if competent, to undertake additional activities, and if so, how many officers would you anticipate authorising? If not, why not?

Mid Ulster District Council would not utilise this flexibility as it would not meet the operational needs of the service. The Council employs Environmental Health Officers with suitable qualifications that enables them to be flexible and responsive to undertake other duties in the area of Environmental Health.

In relation to proposal 4, a clarification in approach to interventions at food business establishments that fall into risk category E for food hygiene:

Question 4. Do you consider that the proposed approach will provide clarity and consistency in the frequency of official controls at these establishments? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council agrees with this proposal.

In relation to proposal 5, removal of the prescriptive number of hours required for continuing professional development (CPD):

Question 5. Do you consider that the approach will provide Competent Authorities with greater flexibility to determine appropriate levels of CPD and training that officers undertake? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council disagrees with this proposal. The Code of Practice should retain the requirement of a minimum 20 hours CPD with 10 core hours.

As professionally qualified officers there is an expectation that officers will maintain a level of continuing professional development. It is important that this element is protected in the Code.

It is imperative that officers receive regular training, including refresher training, to support their competency in food related matters. Food legislation and food technology is continually evolving, and regular training is necessary to ensure that officers have the most up to date knowledge. The FSA should recognise that competency and training are mutually inclusive. In court proceedings the officer's expertise may be questioned by the defence and proof of training can support an expert status.

If there is no incentive to provide training for staff, then there is the potential that training budgets may be affected.

In relation to proposal 6, other amendments to reflect legislative change, provide clarity, improve consistency and keep pace with current practices:

Question 6a. Do you consider that the examples of where the additional score of 22 for vulnerable risk groups would not be used, provides further clarity and will improve consistency in the application of the score? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council agrees with this proposal.

Question 6b. Do you agree that the inclusion of additional descriptors, regarding food safety culture, in part 3 of the food hygiene intervention rating scheme, will provide clarification in the assessment of food safety culture? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council agrees with this proposal.

Question 6c. Do you consider that the clarification within the food hygiene intervention rating scheme about how allergen cross-contamination is taken into account will improve consistency? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council agrees that this clarification will improve consistency in the risk assessment process.

Question 6d. Do you consider that moving the guidance on parts two and three of the food hygiene intervention rating scheme from the FHS Statutory Guidance to the Practice Guidance will improve clarity as to where the guidance can be found? If not, why not? (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council agrees with this proposal.

Question 6e. Do you have any objections to the inclusion of the following qualifications within the Code:

- Trading Standards Professional Apprenticeship with the food module as an appropriate qualification for food standards**
- Degree in Environmental Health awarded by the Dublin Institute of Technology (awarded from June 2012 onwards)**
- Degree in Environmental Health awarded by the Technological University Dublin**

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

Mid Ulster District Council agrees with this proposal.

Question 6f. Do you consider that the amendments to the terminology in the Code and Practice Guidance has improved clarity and consistency between the documents? If not, why not? (Please specify which sections and any aspects of the proposal that require further consideration, and why).

Mid Ulster District Council agrees with this proposal.

Question 6g. Do you agree or disagree with the proposal to remove references to the Competency Framework from the Code but retain references to it in the Practice Guidance to enable the revised approach to competency assessment as set out in the draft Code? Please describe the main reasons for your answer. (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council agrees with this proposal.

Question 6h. Do you agree or disagree with the removal of references to the Practice Guidance and Framework Agreement from the Code? Please describe the main reasons for your answer. (Please specify any aspects of the proposal which require further consideration, and why).

Mid Ulster District Council agrees with this proposal.

Additional comments and suggestions

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

Mid Ulster District Council would seek clarification of the following issues with the Food Standards Risk Assessment Descriptors:

Scale of Supply & Distribution

- Definition – Low Hazard. The wording is not correct – it states - Establishments supplying/distributing food locally, with known local suppliers to the business (including small and local food establishments selling ready to eat food such as corner shops, cafes and restaurants)

This factor is in relation to food being supplied by the specific business and the number of their customers. The wording highlighted needs to be changed as the interpretation would indicate that it is food being received into the business from local suppliers.

Secondly, why is the statement related to ready to eat food? For example, a local butcher supplies cooked ham to a local café, it would be scored as low risk; but if they supplied mince steak, this activity would not meet the definition of low risk.

Please clarify why the term “ready to eat “is specified.

It is suggested that the following would read better - Establishments supplying/distributing food locally to small businesses such as corner shops, cafes and restaurants.

- International, National and Regional

Northern Ireland Councils would need a definition of international, national and regional supply, particularly in the context of Northern Ireland on the Island of Ireland and physically separated from the UK.

- Complexity of Supply Chain

The descriptors for 'Significant Hazard' and 'Minor Hazard' makes reference to the UK. For NI Councils this definition would need to be amended to consider NI's unique position in regard to being in the EU Regulatory regime.

The descriptor for serious hazard references countries outside the UK equivalent regulatory oversight. Additional detail or clarity is sought as to what this means, (e.g.), is this referring to 3rd Countries.

Allergens Information Compliance risk factor

The guidance for scoring the allergen information compliance risk factor includes questions in relation to allergen cross-contamination such as 'has a risk assessment for allergen cross contamination been carried out?'

The draft FLCOP states 'It is recommended that controls for any allergen-related cross-contamination, when preparing food specifically for consumers with a food allergy or intolerance, are assessed during a food hygiene official control'.

Having allergen cross-contamination mentioned in both the food hygiene and food standards risk assessments results in confusion and businesses double scored if there are contraventions identified. There needs to be further clarification in the guidance on situations where cross-contamination is to be considered as part of a food standards assessment.

Questions in relation to impacts

Question 8a. Do you agree or disagree with our assessment of the impacts on Competent Authorities and our assumptions on familiarisation and training resulting from the proposed changes to the Code? Please describe the main reasons for your answer.

Mid Ulster District Council agrees.

Question 8b. Do you agree or disagree with our assessment of the impacts on Competent Authorities in relation to changes to procedures? Please describe the main reasons for your answer.

Mid Ulster District Council agrees with this proposal.

Question 8c. If responding on behalf of a Competent Authority, how long would you estimate that it will take to update local policies and procedures if the proposals were implemented? If providing an estimate, please explain which proposal (or proposals) it relates to.

Mid Ulster District Council would estimate that 1 day to review and amend local policies and procedures.

Question 8d. Do you foresee any other impacts from the implementation of the main proposals detailed beyond those we have identified? Where possible, please explain your views, which proposal (or proposals) they relate to, and provide quantifiable evidence (for example, costs associated with updating your administration systems, existing procedures, the benefits of greater flexibility to allocate staff to activities.)

Mid Ulster District Council would request confirmation that the FSA will cover the cost of any changes necessary to the Councils MIS.

Questions (I, II,III) in relation to future potential developments – Qualifications

Question I. Do you consider that moving the list of FSA endorsed qualifications to the Practice Guidance could provide flexibility to recognise new qualifications more expediently without reducing the professional standards subject to an agreed and published governance procedure being in place? If not, please provide your reasons and evidence of the impact you think this will have.

Mid Ulster District Council strongly opposes the proposal to move FSA endorsed qualifications from the Food Law Code of Practice to the Practice Guidance. This change risks undermining professional standards and compromising the integrity of the food safety profession.

Mid Ulster District Council is aware that District Councils are experiencing recruitment and retention challenges, particularly since Covid and support the FSA work stream in this area. However, Mid Ulster District Council believe that the suggestion to remove the endorsed qualifications from the Code to the Practice Guidance is not a solution. There has already been a reduction in the length of experience required to be fully authorised. The removal of the Environmental Health Registration Board (EHRB) requirement has also weakened the consistent approach to qualification and competence. Any further amendments to this would jeopardise the integrity of the profession. Public perception is that food safety officers have recognised qualifications and that they are overseen by an official body/competent authority.

We acknowledge that there are existing flexibilities within the Code that recognises equivalent qualifications and therefore consider that this proposal is not necessary.

The move from the Code to PG downgrades the status of the listed qualification to an optional list. The FSA endorsed qualifications contained in the Code have to date provided a consistent benchmark for District Councils to ensure that officers

responsible for food and public safety have received the appropriate initial training. To date these qualifications have been paramount to maintaining a high standard of competence throughout the profession. Removing the need to attain these qualifications has the potential to affect the profession as a whole and Mid Ulster District Council would argue that professional standards will be detrimentally affected.

In addition, this may create inconsistencies between Councils on qualification requirements for the recruitment of Food Safety officers, which in turn may create inconsistencies in competence of these officers and inconsistencies in the application of enforcement and regulation. We believe it would also make it more difficult for the FSA to assess officer competence during audits. To date there has never been any concerns raised by the FSA regarding officer competency at audit due to the qualifications.

The endorsed qualifications provide a consistent level that candidates must achieve. Under the new proposals, each individual will be submitting different evidence of qualification and assessed by differing Lead Food Officers. The qualifications are useful for both the profession and employers as it provides a recognised independent level of consistency and removes the burden from the employer to carry out assessments.

Under this proposal, lead food officers will potentially not be officers with a suitable qualification. This too will lead to inconsistencies in officer competence, enforcement and regulation. The lead officer role is essential in ensuring the appropriate oversight of the food safety function and the qualifications required to do it should be protected.

Any downgrading of the qualification status of officers carrying out official controls could leave officers open to legal challenge in respect of their competency and potentially could degrade the expert witness status of those officers in a court.

EHOs develop a wide skill set, due to the training they must undertake to achieve the appropriate qualification. They are not restricted to the function area they work in and can work across a range of environmental health functions while carrying out their role in food safety. This enables officers to maximise the outcomes from any inspection, investigation or contact with business.

Food safety officers work alone and are required to be able to make the appropriate decision at the time of any visit. They must be able to work unsupervised and be competent to make decisions unaided and sometimes under pressurised or volatile situations. The wide skill set, and knowledge gained under the current system of recognised qualifications enables officers to make such decisions. While some councils do employ officers without the listed qualifications, these officers do not work unsupervised or unaided. It is the EHO that makes the decision on the most appropriate course of action based on the information gathered by the technical assistant or officer. These officers allow DCs to use resources effectively, but they do not replace the need for suitably qualified staff.

The move to the PG also removes the robust oversight by FSA and the EU on the qualification of the staff employed to carry out the Food Safety functions.

EU legislation sets standards for food safety, in that food safety units must have a sufficient number of suitably qualified, authorised and experienced staff, i.e. have obtained a recognised qualification, rather than just training. For example, the Trade in Animal and Related Products (TARP) regulations make the distinction between Official Fish Inspectors *being qualified* and assistants *being trained*. Current legislation also set standards for approved establishments within the Council area, this proposal could potentially impact such premises if the EU were to deem officers in NI as not suitably qualified due to this change.

Without independent and consistent oversight, there is the potential for training bodies or private consultants to create training qualifications with no accreditation.

Under this proposal, there is the potential for the food safety function to move to private contractors with their own auditors. Private contractors and auditors will charge a fee for their services which could be seen as impacting their impartiality.

DC EHOs are vital in providing a neutral and fair regulatory enforcement programme. They are required to undertake conflict of interest declarations to ensure an unbiased approach to regulation and to providing objective and impartial advice, guidance and, where necessary, enforcement.

The strong working relationships between the DCs in the eleven Councils could be severely impacted by the introduction of private contractors and auditors. All 11 DCs currently work together to ensure consistent and effective regulation and enforcement across the Districts. This close working relationship ensures that food and public safety is maintained across the country in areas such as food fraud, incidents and product recalls and withdrawals. Private contractors may have no such interest in joint working, or in the wider food safety remit of District Council officers.

The removal of suitable qualifications has the potential to have negative implications for human resource management within the DCs, e.g. this could result in a mix of staff with different qualifications potentially all able to do the same job but on differing pay grades. District Councils may experience difficulties in managing the range of job descriptions, differing contracts and different grading structure.

Rather than move the qualifications to an optional requirement, it would be preferable to implement some of the other flexibilities suggested in this consultation and assess their effectiveness first.

District Councils would also welcome progression of some of the previously suggested solutions that could make our work more efficient and enable DCs to manage their time and resources more effectively e.g. permit to trade, widening the scope of FPNs to other food safety offences.

Mid Ulster District Council currently liaises with the University of Ulster, who provide the Environmental Health degree in NI, to encourage students to consider District Councils as an employer. The Council also provides a student placement annually.

Mid Ulster District Council will continue to work with colleagues in other Local Authorities to provide guest lectures and bespoke training for the University. Mid Ulster District Council also works with schools and colleges to promote the profession. Support from the FSA in this regard would be appreciated to enable DCs to put adequate resources to these initiatives. Awareness raising of the important role of food safety officers in protecting food and public safety should be invested in.

Question II. What do you perceive to be the advantages, disadvantages and impacts if we move the list of qualifications from the Code to the Practice Guidance?

Please see answer to question I

Question III. Is there an alternative way that we could more expediently update the list of FSA endorsed qualifications from the one presented?

Mid Ulster District Council would propose that the FSA explore the viability of a shorter consultation timescale for any amendments to the FSA endorsed qualifications.

The FSA endorsed qualifications are not developed very often and to develop an equivalent would take time. This would give time to provide a consultation before implementation.

If the qualifications are removed from the Code and put in the PG then there is no opportunity for consultation on any amendments.

If qualifications are moved to the PG and qualifications are removed from the list, then there is the potential that existing staff may no longer meet the requirements of their role, and the lack of consultation would mean FSA would be unaware of the potential impacts.