



Department for
Business, Energy
& Industrial Strategy

Regulatory Delivery

UNLOCKING THE POTENTIAL OF PRIMARY AUTHORITY: IMPLEMENTING THE ENTERPRISE ACT 2016

Government response to consultation



A blue curved line graphic that starts at the bottom left, rises to a peak in the center, and then slopes down towards the bottom right, ending with a small circular dot.

July 2017

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Executive summary

This document sets out the Government's response to the consultation on 'Unlocking the potential of Primary Authority: Implementing the Enterprise Act 2016' which took place between 13 February and 7 April 2017. It also outlines how the consultation responses and feedback received through a wider and longer-term stakeholder engagement and implementation programme have been used to develop the statutory guidance that underpins Primary Authority. The consultation document can be found at <https://www.gov.uk/government/consultations/unlocking-the-potential-of-primary-authority>.

This consultation sought views on the draft Co-ordination of Regulatory Enforcement Regulations 2017. The draft regulations include measures to ensure that Primary Authority can operate from 1 October 2017 when the scheme is extended and simplified by provisions in the Enterprise Act 2016. It also sought views on replacing the 'categories' system for defining the scope of partnerships with an approach where, by default, a partnership will cover all the regulatory functions of the local authority within scope of Primary Authority.

Sixty-four formal responses were received from businesses, local authorities, national regulators and other stakeholders. Feedback on the proposals was also obtained from around 240 stakeholders who attended engagement events held during the consultation period and at other events and meetings held as part of the wider implementation programme.

Stakeholders were broadly supportive of the measures in the draft regulations. There was a wider range of views on the proposed new approach for determining the scope of partnerships. A number of concerns were raised about how the proposed approach would work in practice and about its potential to limit business choice and to limit local authority participation in Primary Authority.

As a result of the consultation responses and the feedback from wider engagement with stakeholders we have amended the draft regulations. They specify the Competition and Markets Authority, the Food Standards Agency, the Gambling Commission, the Health and Safety Executive, and the Secretary of State¹ as 'supporting regulators'. A new more generic approach is taken to defining the scope of Primary Authority in Scotland and Northern Ireland, and the definition of 'enforcement action' has been clarified.

A draft of revised Primary Authority Statutory Guidance has been produced. This reflects and clarifies the changes to Primary Authority introduced by the Enterprise Act 2016 and the new secondary legislation.

¹ The Secretary of State will provide support in relation to the areas of metrology and product safety.

The number of businesses in Primary Authority is expected to increase from 17,000 to an estimated 250,000 by 2020 and simplification of the administrative arrangements for the scheme is required to support this expansion. The Enterprise Act delivers much of the simplification needed and the new approach to defining partnership scope will also make an important contribution. The draft revised statutory guidance describes how the approach will work in practice and there is provision for bespoke arrangements where the default approach is not able to meet the needs of a business for particular reasons.

The draft regulations are expected to come into force on 1 October 2017. The revised statutory guidance will be finalised, taking account of any feedback received, and will be issued at the same time. In the meantime Regulatory Delivery will work together with existing partnerships to ensure a smooth transition to the new arrangements.

The Government is committed to reviewing the regulations within five years.

The consultation

What was the background to the consultation?

1. Primary Authority, introduced in 2009, is making it easier and simpler for businesses partnering with a local authority to understand and follow regulation thereby enabling them to invest and grow.
2. The statutory basis for the scheme is provided by the Regulatory Enforcement and Sanctions Act 2008 (as amended) and associated secondary legislation. Currently, Primary Authority is open to UK businesses regulated by more than one local authority or businesses in a co-ordinated group that are collectively regulated by more than one local authority. The scheme is administered by the Regulatory Delivery Directorate within the Department for Business, Energy and Industrial Strategy (BEIS) and its practical operation is underpinned by Primary Authority Statutory Guidance issued by the Secretary of State.
3. Provisions in the Enterprise Act 2016 will, from 1 October this year, simplify the operation of Primary Authority and open it up to many more small businesses; including those located in a single local authority area and pre-start up enterprises. They also enable national regulators to take a more structured role in Primary Authority. The provisions in the Enterprise Act mean that some consequential changes are needed to the secondary legislation and to the statutory guidance that set out the detail that enables Primary Authority to work in practice.
4. The consultation is part of a wider and longer-term engagement and implementation programme. The changes being introduced by the Enterprise Act followed a post-implementation evaluation and consultation with stakeholders on '[Extending and simplifying Primary Authority: keeping the UK competitive](#)' in September 2015. We have continued to engage with business and local authority stakeholders since then through regular events and meetings – particularly with the Business Reference Panel, the Primary Authority User Groups in England and Wales, and the network of expert panels. We have also worked closely with Welsh Government to ensure that Primary Authority properly and fully takes account of devolved Welsh matters. This has enabled us to take a consultative and iterative approach to developing the full package of measures needed to support the scheme from 1 October including the new Primary Authority Register and the draft revised statutory guidance.

What did we consult on?

5. The consultation sought views on the draft Co-ordination of Regulatory Enforcement Regulations 2017. These draft regulations included a list of the national regulators that it is proposed will become more closely involved with Primary Authority as ‘supporting regulators’. They defined the scope of Primary Authority in Scotland and Northern Ireland. They provided a simpler more general definition of ‘enforcement action’. They also set out the process for dealing with disagreements arising in relation to proposed enforcement action against a business that has a primary authority – the determination process.
6. Views were also sought on a separate administrative proposal to change the way in which the scope of partnerships between businesses and primary authorities are defined and that will be reflected in the revised statutory guidance. The proposal was to replace the use of categories, such as ‘food standards’ and ‘fair trading’, with an approach whereby the scope of a partnership will, by default, cover all the regulatory functions of the local authority that are within scope of Primary Authority.
7. During the consultation, and previously as part of the wider and longer-term engagement and implementation programme, views have been sought on the necessary changes to the statutory guidance. This has been achieved through discussions and meetings with national regulators, local authorities and businesses both on a one to one basis and through Primary Authority User Groups in England and Wales, Supermarkets Group, Experts Panels and the Business Reference Panel which Regulatory Delivery organises and runs.

Who did we consult?

8. The consultation was published on [GOV.UK](#) and on the BEIS [Citizen Space consultation hub](#). It was also signposted on the Primary Authority Register and highlighted to members of the Primary Authority User Groups in England and Wales and the Business Reference Panel. In addition, Regulatory Delivery organised a number of engagement events – two in England and one each in Scotland and Wales – where the proposals were presented and discussed with local authority and business stakeholders. Feedback was also obtained at other events and meetings.

Who responded?

9. A total of 64 written responses were received. Of these, two were from national regulators, 35 from local authority stakeholders, 24 from businesses and their representative bodies, and three from other stakeholders. A detailed breakdown is provided below.
10. A full list of organisations and businesses is provided at [Annex 1](#).

Stakeholder category	Number	% of total*	Number with a Primary Authority partnership	% for stakeholder category*
National regulators	2	3%	-	-
Local authority	30	47%	26	87%
Local government / professional representative bodies	5	8%	-	-
Businesses	10	16%	9	90%
Business representative body / trade association	14	22%	10	71%
Charity / Social Enterprise	2	3%	-	-
Individual	1	2%	-	-
Total	64	100%	-	-

* Figures have been rounded.

11. The engagement events were well attended with approximately 240 stakeholders in total participating. This included representatives from a range of businesses and trade bodies as well as local authority officers.

Summary of responses and Government response

Introduction

12. An overview of the written responses to our proposals and the discussions with stakeholders at the engagement events is provided below, together with the Government response.
13. The Government response refers to the draft Co-ordination of Regulatory Enforcement Regulations 2017 and to draft revised statutory guidance, copies of which are provided at [Annex 2](#) and [Annex 3](#) respectively.

Enabling national regulators to support primary authorities

What was proposed?

14. The Enterprise Act changes will enable specified national regulators to take a more structured role in Primary Authority. They will be able to assist primary authorities in developing advice and guidance and developing and managing inspection plans for the businesses and co-ordinators they work with. The consultation draft of the Co-ordination of Regulatory Enforcement Regulations 2017 listed the national regulators that were being proposed as the first supporting regulators. These were: the Competition and Markets Authority; the Food Standards Agency; the Gambling Commission; the Health and Safety Executive, for the regulatory areas for which they are responsible; and also the Secretary of State.²
15. Stakeholders were asked for their views on the list of supporting regulators and about the benefits of their involvement in Primary Authority. They were also asked what demand they anticipated there would be for support and whether businesses would be willing to pay for such support on a cost recovery basis.

What did stakeholders say?

16. For the most part both local authority and business stakeholders were positive about the more structured involvement of national regulators in Primary Authority. They considered that those listed were appropriate and were a good starting point.

² The Secretary of State will provide support in relation to the areas of metrology and product safety.

17. Stakeholders suggested a range of other national regulators that could be added to the list now or in the future. The most commonly mentioned were Defra and the Department of Health in relation to food standards; the Environment Agency in relation to waste and environmental control; and the Advertising Standards Authority in relation to fair trading practices.
18. Stakeholders generally considered that involving national regulators more closely in Primary Authority will strengthen relationships and facilitate closer co-operation and collaboration; bringing benefits for regulators, for businesses, and ultimately for citizens. They expected primary authorities to benefit from access to specialist knowledge and expertise which would add weight to Primary Authority Advice and ensure inspection plans are as effective as possible. They envisaged that, in turn, this would drive increased consistency for businesses and help ensure enforcement action is fair and proportionate. They thought that supporting regulators should benefit from a greater understanding of how regulation affects businesses and that the role will give them a tool to help them deliver their policy objectives.
19. Stakeholders highlighted that success depends on having much greater clarity on what the supporting regulators will offer and on them having the capacity and resource to deliver this. They thought also that success depends on having greater clarity on how the process will work in practice and on the roles and responsibilities of the primary authority, the business partner or co-ordinator and the supporting regulator. They had concerns about the potential for increased bureaucracy and for delays in providing advice and they highlighted that the scope for disagreements between national and local regulators will need to be managed.
20. Stakeholders found it difficult to predict demand at this stage though generally considered that involvement of a supporting regulator should not be a matter of routine. They envisaged that involvement of supporting regulators is likely to be sought on an *ad hoc* basis for complex, untested or unusual issues or where national guidance needs to be tailored for specific businesses.
21. Demand will be subject to costs and stakeholders foresaw a number of challenges with this; particularly for smaller businesses. More clarity was requested on how charging will work in practice and what fees will apply. The need to ensure businesses do not pay twice, that rates are comparable to those charged by local authorities, and that businesses get value for money were emphasised.

Government response

22. The Competition and Markets Authority, the Food Standards Agency, the Gambling Commission, the Health and Safety Executive, and the Secretary of State³ are specified in the draft Co-ordination of Regulatory Enforcement Regulations 2017 as supporting regulators.

³ The Secretary of State will provide support in relation to the areas of metrology and product safety.

23. To provide clarity for businesses and primary authorities on how the process will work in practice, a new section has been included in the draft revised statutory guidance. This is at Part G and outlines the role and responsibilities of a supporting regulator. This includes publishing clear information setting out the support that it will make available to primary authorities and their partner businesses, its cost recovery policy and the nature of the arrangements that it will expect to put in place with any individual primary authority and their partner business or co-ordinator. In terms of costs; businesses or co-ordinators will need to agree cost recovery arrangements up front so they will have an opportunity to resolve any concerns about charging before the supporting regulator gets involved.
24. The Government is also committed to working with other national regulators, including those that stakeholders suggested should be more closely involved in Primary Authority, with a view to extending the number of supporting regulators in the future.

Delivering Primary Authority in Scotland and Northern Ireland

What was proposed?

25. The scope of Primary Authority in Scotland and Northern Ireland extends only to reserved matters that are regulatory functions of local authorities. Currently, these regulatory functions are listed in the [Co-ordination of Regulatory Enforcement \(Regulatory Functions in Scotland and Northern Ireland\) Order 2009](#). The amendment of the Regulatory Enforcement and Sanctions Act 2008 by the Enterprise Act 2016 means that for the scheme to continue to operate in Scotland and Northern Ireland as it does now, the 2009 Order must be replaced.
26. Provisions were included in the consultation draft of the Co-ordination of Regulatory Enforcement Regulations 2017 and stakeholders were asked if they had any comments on these.

What did stakeholders say?

27. No comments were made on the draft regulations but a number of stakeholders expressed views on the practical operation of Primary Authority in Scotland and Northern Ireland.
28. Businesses considered that the continuation of Primary Authority in Scotland and Northern Ireland was important to enable them to operate across the UK and for co-ordinated partnerships with businesses in different nations to fully benefit from the scheme. From the responses it is clear that some stakeholders still felt challenged by perceived inconsistencies with devolved legislation and there is a desire to have alignment through harmonised and integrated arrangements, as far as possible, across the four nations.

Government response

29. The Government recognises that differences in regulatory policy across the four UK nations can be challenging for businesses. We will continue to work closely with the Devolved Administrations to ensure regulation works for British business across the UK now and in the future.
30. The way that the scope of Primary Authority in Scotland and Northern Ireland is defined in the Co-ordination of Regulatory Enforcement Regulations 2017 has been simplified. The generic approach now taken makes the scope clearer and easier to describe and understand. It also future proofs the definition such that it will not need to be updated to reflect changes to legislation covered by Primary Authority.

Clarifying and simplifying enforcement action in Primary Authority

What was proposed?

31. Where an enforcing authority proposes to take action against a business with a primary authority it must notify the primary authority. In most cases this must be in advance so that the primary authority can consider if the action is inconsistent with any advice it has given. In cases where there is a significant and imminent risk of harm the action can be notified retrospectively.
32. The definition of ‘enforcement action’ establishes which actions must be notified and is currently set out in [the Co-ordination of Regulatory Enforcement \(Enforcement Action\) Order 2009](#) by listing individual notices, under specified legislation, and by some general provisions. This means that when new regulatory requirements are introduced, that fall within scope of Primary Authority, the definition has to be amended to include any specific enforcement actions associated with those new requirements that the current definition does not cover. This is an administrative burden and has resulted in the definition becoming increasingly complex. It also means there is a delay in updating the legal definition when new enforcement actions are introduced. This creates confusion about what actions require notification.
33. To address these issues a more general definition of ‘enforcement action’ was proposed in the consultation draft of the Co-ordination of Regulatory Enforcement Regulations 2017. Stakeholders were asked if this definition was sufficiently clear. They were also asked if the draft regulations made it sufficiently clear when notification may be given retrospectively.

What did stakeholders say?

34. The new approach was welcomed by both business and local authority stakeholders on the basis that it is clear and delays will be avoided following changes to legislation. The definition was considered to be generally comprehensive but some clarifications were requested. Confirmation was, for example, sought on inclusion of the refusal or revocation of a licence in respect of explosives, fireworks storage or petroleum storage; and on the suspension or withdrawal of approval under food hygiene legislation. There were also questions on whether warning letters or ‘notification of deficiency’ letters must be notified. There was some confusion about what constitutes a food hygiene certificate and also about whether fixed penalty notices for failure to display food hygiene ratings in Wales must be notified.
35. Stakeholders considered that the draft regulations are sufficiently clear as to when enforcement action can be notified retrospectively. It was suggested that including timescales would add benefit. It was also suggested that setting out, in the statutory guidance, the types of circumstances where enforcement action may proceed prior to notification would facilitate consistency.

Government response

36. The definition of ‘enforcement action’ in the draft Co-ordination of Regulatory Enforcement Regulations 2017 has been amended to clarify which actions are included. The definition extends to statutory actions where the enforcing authority is using powers in legislation that is within scope of Primary Authority. This means that warning letters or similar notifications that do not have a statutory basis are not covered. It also means that any actions taken in relation to the statutory Food Hygiene Rating Scheme in Wales do not require notification as the relevant legislation is not within scope of Primary Authority.
37. The relevant provisions in the statutory guidance are at Part E and the revised draft clarifies that any action taken by an enforcing authority in relation to any authorisation provisions (such as a licensing, permitting, registration, approval or certification provision) will be enforcement action where the action constitutes the imposition of a sanction.
38. The revised draft statutory guidance also provides example of where retrospective notification would be appropriate. It highlights that this notification should be made as soon as practicable after the action is taken as is required by the Regulatory Enforcement and Sanctions Act 2008 (as amended).

Determinations: updating requirements for applications

What was proposed?

39. Disagreements arising in relation to proposed enforcement action against a business in Primary Authority may be referred to the Secretary of State for consideration – this is known as the determination process. The process is set out in the Regulatory Enforcement and Sanctions Act 2008 (as amended) and the [Co-ordination of Regulatory Enforcement \(Procedure for References to LBRO\) Order 2009](#). Again, the introduction of the Enterprise Act 2016 means the 2009 Order must be replaced.
40. Appropriate provisions were included in the consultation draft of the Co-ordination of Regulatory Enforcement Regulations 2017 and stakeholders were asked if they had any comments.

What did stakeholders say?

41. A number of business stakeholders raised concerns about potential conflicts of interest for supporting regulators in cases where there is a dispute about advice that they were involved in developing as a supporting regulator. They felt that the potential for conflict of interest may be amplified in cases where the Secretary of State has been involved as a supporting regulator. Clarity on how this will be dealt with was considered important in maintaining business confidence in the process.
42. It was suggested that guidance setting out the process would be of benefit and would provide transparency on how and by whom determinations are assessed and decisions made.
43. The cost involved, and resource, needed to seek a determination or deal with one was raised by a business stakeholder. The concern was that, potentially, businesses may be unfairly disadvantaged if appropriate challenges are not made. With many more businesses now having access to Primary Authority, there was concern that the number of determinations may increase and it was suggested that a lower level process for resolving disputes should be established.

Government response

44. In the eight years since Primary Authority was introduced there have only been two applications to the Secretary of State for determination. The vast majority of disagreements have been resolved quickly through discussion between local authorities and with support from Regulatory Delivery where needed. Given the success of this approach to date the Government considers that it should continue rather than introduce a more formal lower level mechanism.
45. As regards the Secretary of State, governance arrangements will be established to separate the functions relating to the supporting regulator role from those relating to the determinations process. This commitment is set out in the draft revised statutory guidance (section 1.29).

46. To provide transparency on how determinations are assessed and decisions made, and applying lesson learned from the two determinations so far, the draft revised statutory guidance has been amended to clarify where Primary Authority Advice or Primary Authority Advice to Local Authorities is considered to be ‘correct’ and properly given (see sections 6 and 7). The Determinations Policy & Procedure will also be updated.

Defining partnerships

47. Stakeholders were also asked for views on a separate administrative proposal to replace the use of categories, such as ‘food standards’ and ‘fair trading’, for defining the scope of partnerships with an approach whereby the scope will, by default, cover all the regulatory functions of the local authority that are within scope of Primary Authority.

What did stakeholders say?

48. Stakeholders acknowledged the issues with the categories system and its administration and sustainability. Some welcomed the proposal and considered that the changes are a common sense approach to ensuring less burdensome administration and future sustainability. Some local authorities also saw it as an opportunity to develop a ‘one stop shop’ for all regulatory needs and play a greater role in Primary Authority.
49. The majority, however, found the current system to work well and said they were generally not persuaded by the rationale behind the proposed change. They considered that, while it may make central administration of the scheme easier, it may create more problems than it will solve for businesses and local authorities and has the potential to undermine the success of Primary Authority. Some stakeholders requested that further consideration be given to simplifying the existing categories system.
50. The main concern, expressed by both business and local authority stakeholders, was that the new approach could limit business choice; for example in choosing different primary authorities depending on the level of resource, expertise and competency a local authority has in a particular area, or depending on geographic location. For those with a single partnership there were concerns about the impact of devolution in Wales and having to have multiple partnerships rather than a single point of contact; which was felt to work well and be one of the main advantages of Primary Authority.
51. Some local authority stakeholders were concerned that the new approach could give competitive advantage to unitary authorities. Fire and Rescue Services that were not part of a county council similarly considered that they could be disproportionately affected. More generally it was felt that the proposed approach may limit local authority participation in Primary Authority as some local authorities may not have the necessary resource and expertise to offer a service across all their functions. The view was also expressed that the complex structure of local government may mean that the new approach will not be straightforward and future reorganisations could bring additional challenges.

52. The impact on existing partnerships was not clear to many local authority or business stakeholders. Some expressed general concern about the potential for administrative and cost burdens that may result from having to terminate existing arrangements and initiate new partnerships.
53. In terms of setting up new partnerships; stakeholders generally found the proposed approach confusing and complicated and did not, for example, understand how ‘layering’ or ‘sequencing’ would work where multiple partnerships were needed. It was considered that greater clarity and guidance was needed on how the process will work in practice including in relation to transitional arrangements. It was thought that guidance will also be needed on whether local authorities can join forces to strengthen their offering, set up arrangements involving sub-contracting to other local authorities or perhaps have a ‘lead’ primary authority and ‘supporting primary authorities’.

Government response

54. The Government is committed to extending Primary Authority to enable many more businesses to benefit and anticipates that by 2020 the number participating will have grown from the current 17,000 to around 250,000 including a large number of smaller businesses. To accommodate this expansion the administration of the scheme must be simplified and the system for defining partnerships must be more sustainable than the current approach.
55. The new approach where the default will be for a partnership to cover all the regulatory functions of the local authority will be more straightforward for most new businesses joining Primary Authority.
56. The majority of businesses already in partnerships have simple arrangements and the move to the new approach will not change these significantly. The partnership can continue to focus on agreed activities but is future proofed so that advice can be given on other areas if there is a need.
57. The draft revised statutory guidance explains the nomination process in detail (see section 4 in particular). It describes and provides examples of allocation of partnership functions including where more than one primary authority is involved. This mechanism means that different types of local authorities will still have the opportunity to offer Primary Authority services.
58. The Government acknowledges the concerns of those currently involved in more complicated partnership arrangements, where a business has more than one existing primary authority, and is committed to working with them to agree and implement bespoke arrangements where necessary. The draft revised statutory guidance also makes provision for agreeing bespoke arrangements for new business joining Primary Authority where the default approach is not able to meet their needs for particular reasons.

59. The Government acknowledges the concerns about the impact of resources needed to set up new partnerships. The new Primary Authority Register, which is being developed using an agile approach and with extensive user testing, will streamline the process. Regulatory Delivery will have active dialogue with stakeholders through the transition period and will work closely with individual partnerships to minimise any burdens.
60. As regards the operation of Primary Authority in Wales, the Government has been working closely with Welsh Government to ensure that Primary Authority properly and fully takes account of devolved Welsh matters. Where multiple partnerships exist primary authorities will be encouraged to work together and with the business to agree arrangements that will work best for them. Part D of the statutory guidance sets out options for working in a network of primary authorities. Regulatory Delivery will be working with them and with primary authorities in England and Wales to support this.

Impact assessment

61. Impact assessments for the measures in the draft regulations and for moving to the new approach to defining partnerships have been prepared and are enclosed at Annex 4 and Annex 5. These have been submitted for fast track validation by the Regulatory Policy Committee as the changes represent low-cost regulatory measures.

Next steps

62. The draft Co-ordination of Regulatory Enforcement Regulations 2017 at Annex 2 will be laid before Parliament in time to come into force on 1 October 2017. The draft revised statutory guidance will be finalised, taking account of any feedback received, and issued to coincide with this.
63. The new Primary Authority Register will be available for 1 October and new Primary Authority Terms and Conditions have been developed. Regulatory Delivery will be working together with existing partnerships to ensure a smooth transition to the new arrangements.
64. The Government is committed to reviewing the Regulations within five years.

Annex 1 – List of respondents

Central Government

Gambling Commission

Food Standards Agency

Local government/professional representative bodies

Association of Chief Trading Standards Officers

Chief Fire Officers Association/National Fire Chiefs Council

Directors of Public Protection Wales

Wales Heads of Trading Standards

Welsh Local Government Association

Local authorities

Argyll & Bute Council

Buckinghamshire & Surrey Trading Standards

Cherwell District Council/South

Cornwall Council - Fire and Rescue Service

Cornwall Council - Public Protection Service

Glasgow City Council

Hampshire Fire and Rescue Service

Hampshire County Council

Hertfordshire County Council

Horsham District Council

Huntingdonshire District Council

London Borough of Hammersmith and Fulham/Royal Borough of Kensington and Chelsea

London Fire and Emergency Planning Authority

Merseyside Fire & Rescue Authority

Merthyr Tydfil County Borough Council

Milton Keynes Council

Monmouthshire County Council

Norfolk County Council

Northamptonshire County Council

Oxfordshire County Council Trading Standards Service

Reading Borough Council

Rhondda Cynon Taf County Borough Council
Trading

Shropshire Fire and Rescue Service

Slough Borough Council

South Norfolk Council

South Yorkshire Fire and Rescue

Tyne and Wear Fire and Rescue Service

Wakefield Council

Wiltshire Council

Worcestershire Regulatory Services

Business representative body/trade association

Association of British Bookmakers

Association of Convenience Stores

British Beer & Pub Association

British Frozen Food Federation

British Hospitality Association

British Retail Consortium

British Sandwich Association

Food Storage and Distribution Federation

Health Food Manufacturers' Association

National Federation of Meat and Food Traders

National Federation of Retail Newsagents

Ornamental Aquatic Trade Association

Proprietary Association of Great Britain

Wine and Spirit Trade Association

Individual businesses

Amazon UK Services Ltd

Asda Stores Limited

Ashfords LLP

Avis Budget UK Ltd

Greggs plc

Ladbrokes Coral Group plc

Park Garage Group plc

Sainsbury's Supermarkets Ltd

Waitrose Limited

Wm Morrison Supermarkets plc

Charity/Social Enterprise/Individual

Electrical Safety First

Social Enterprise UK

Individual Environmental Health Practitioner



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