



East Cambridgeshire
District Council

Food Safety Enforcement Policy Statement

Written by Senior Environmental Health Officer

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Copies of the policy can be provided in an alternative format. Please contact East Cambridgeshire District Council on 01353 665555 to request the format you require, or email foodandsafety@eastcambs.gov.uk, or write to Commercial Team, Environmental Services, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, CB7 4EE

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Amendment log

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1. Introduction

- 1.1. The purpose of this policy statement is to express the commitment and intentions of East Cambridgeshire District Council (“the council”) to the principles of consistent and effective enforcement of food safety legislation in accordance with the Regulator’s Code (www.gov.uk/government/publications/regulators-code).
- 1.2. The council has a Corporate Enforcement Protocol (www.eastcambs.gov.uk/east-cambs-district-council/policy-documents) which outlines the general approach it takes when considering enforcement action. This policy builds on the Corporate Protocol and outlines in detail the approach taken by the Environmental Health Team in relation to food safety enforcement.
- 1.3. This policy recognises and gives support to the specific guidelines and enforcement action contained in the statutory Food Standards Agency (FSA) Code of Practice and its accompanying Practice Guidance (www.food.gov.uk/about-us/food-and-feed-codes-of-practice). It also acknowledges the Primary Authority scheme (www.gov.uk/guidance/local-regulation-primary-authority) currently overseen by the Government’s Office for Product Safety & Standards and Department for Business, Energy & Industrial Strategy.



2. Statement of intent

- 2.1. It is the council's policy to ensure that food and drink intended for human consumption is without risk to the public health or safety of the consumer. This includes items that are produced, stored, distributed, handled, purchased or consumed within East Cambridgeshire.
- 2.2. To achieve this objective enforcement action will be proportionate to the risk(s) presented, the seriousness of any legislative contravention and in accordance with the guidelines of this policy.
- 2.3. Initially, officers will adopt an educative approach with those responsible in order to secure compliance with relevant food safety legislation. If that approach does not work officers will enforce the law by using a range of enforcement options.
- 2.4. Enforcement action can range from verbal and written warnings to the use of statutory notices, simple cautions and prosecution. Prosecution will not normally constitute a punitive response to minor contraventions of food safety legislation.
- 2.5. Departures from these policy guidelines may be needed where there is an elevated risk to the wider public health. It is anticipated that such cases will be the exception. Any departure will be discussed with the senior environmental health officer (SEHO) or, in their absence, after consultation with the environmental services manager (ESM).
- 2.6. It should also be noted that from time to time advice or instructions may be given by the FSA specifying a particular enforcement approach. In such instances, the council will adhere to such instructions when appropriate to do so.
- 2.7. All authorised officers shall have regard to this policy when carrying out their assigned duties.



3. General principles

- 3.1. The council aims to secure full compliance with all relevant food safety legislation that it is responsible for enforcing.
- 3.2. It is accepted there should be a quick and effective response to serious breaches of legislation as distinct from an efficient and effective enforcement approach to other breaches.
- 3.3. The council's officers will deal with anyone subject to the enforcement process in a courteous, fair and objective manner and in line with its policy on equal opportunities and its Corporate Enforcement Protocol.
- 3.4. Officers will be sensitive to the needs of businesses including the requirement for prompt, concise, definitive and timely advice. Any intervention will aim to impose the minimum burden consistent with the law.
- 3.5. Officers will assist businesses and individuals to understand any requirements and obligations imposed by legislation. They will encourage good practice in line with any relevant industry guidelines, codes of practice or legislation. In considering whether good practice has been adopted, officers will take account of relevant guidance using professional judgement about the extent of the risks and the effort that may be required to counter them.
- 3.6. Where food safety legislation is not prescriptive officers shall work with businesses to ensure that a suitable balance can be drawn between the standards required by law and the demands on the business.



4. Officers

- 3.7. If informal approaches do not achieve the required improvement, officers will use formal enforcement measures set out in legislation. This can include the issuing of statutory notices or closure of a food business. Where a business has demonstrably demonstrated that they are not willing, or capable of meeting the minimum standards required officers may have to resort to prosecution or simple cautions.
- 3.8. Where necessary, the council will use its powers to visit food businesses in other local authority areas to investigate potential offences that have arisen within East Cambridgeshire.
- 3.9. Where appropriate, the council reserves its right to carry out covert surveillance of individuals or organisations. In doing so, officers will comply with the Regulation of Investigatory Powers Act 2000, human rights legislation and any associated guidance, along with any internal policies and procedures.
- 3.10. Where resources permit, the council will provide suitable information to the food trade designed to encourage compliance with the law. This will be particularly relevant where an initial educative approach is appropriate and encouraged by the FSA. Efforts will be made to provide guidance in languages other than English where there is a demand and where resources permit.
- 4.1. The SEHO (Commercial) is designated as the lead food officer for the purposes of the FSA.
- 4.2. All officers who carry out the enforcement of food safety legislation are authorised in writing in accordance with the council's scheme of delegation. Such authorisations are issued under the council's constitution and in accordance with the code of practice.
- 4.3. The council will ensure its officers are suitably qualified, experienced and competent with respect to the enforcement duties they have been authorised to carry out. Officers shall only act in accordance with their own authorisations.
- 4.4. The council shall also ensure each officer receives suitable and sufficient structured training that is managed, assessed and recorded on an ongoing basis.

5. Principles of enforcement

- 5.1. The enforcement of food safety legislation should be guided by the principles that are contained within the Enforcement Concordat (publications.parliament.uk/pa/ld199899/ldselect/lddereg/111/11107.htm) that has been formally adopted by the council, in addition to the Code for Crown Prosecutors (www.cps.gov.uk/publication/code-crown-prosecutors) and the Regulators Code (www.gov.uk/government/publications/regulators-code).
- 5.2. The principles of the Enforcement Concordat are as follows:
- 5.2.1. Standards
- The council remains accountable to central government, the FSA and local taxpayers for its actions and omissions. This means that it must have clear policies and standards against which it can be judged. The council will consult with businesses and other relevant interested parties, including technical experts where appropriate, and draw up these standards setting out the level of service and performance the public and businesses can expect to receive. These standards will then be made available to those who are regulated.
- 5.2.2. Openness
- The council will provide information and advice in plain language on the law it enforces and will disseminate this as widely as possible. It will also be open about how it sets about its work, including any charges that are made for specific activities. Officers will discuss general issues, specific compliance failures or problems with anyone experiencing difficulties.
- 5.2.3. Helpfulness
- The council recognises that its role involves actively working with businesses, especially small and medium sized businesses, to advise and assist on compliance. The council will ensure that, wherever practicable, its enforcement services are effectively co-ordinated to minimise any unnecessary overlaps and time delays. Officers will provide a courteous and efficient service and staff will identify themselves by name. Officers will provide a contact point and telephone number for further dealings with the council and will encourage businesses to seek advice and information from them.
- 5.2.4. Complaints about service
- In cases where disputes cannot be resolved, any rights of complaint or appeal will be explained by the officer, with details of the process and the timescales involved. In this instance the officer will ensure all relevant parties have access to its publicised complaints procedure.

5.2.5. Proportionality

Both those the law protects and those on which it places a duty expect that action taken by the council to achieve compliance should be proportionate to the food safety risks posed to consumers and to the seriousness of any breach of legislation. Deciding what is reasonable or appropriate to control risks involves the exercise of judgement and discretion by enforcers based on sound professional judgement.

5.2.6. Consistency

Consistency of approach does not mean uniformity; it means taking a similar approach in similar circumstances to achieve similar ends. Food businesses managing similar risks expect a consistent approach from enforcing officers in the advice provided, the use of powers, issuing of approvals, decisions on appropriate enforcement action and response to food-related incidents.

To promote consistency, regular discussions are held with other members of the County Food Liaison Group (Meeting attended by the lead food and safety officers of the Cambridgeshire authorities together with Peterborough City). There are also effective arrangements for liaison with other enforcing authorities, the FSA, and any primary or home authorities.

5.2.7. Transparency

Transparency means helping businesses understand what is expected of them and what they should expect from the council. It means making it clear to businesses what they have to do, or not do, to meet these expectations. Officers will distinguish between what is a legal requirement and what is recommended when issuing advice or guidance and explain why they intend to or have taken a particular course of action.

5.2.8. Targeting

Targeting means making sure resources are targeted primarily on those whose activities give rise to the most serious risks or where hazards are least well controlled. It also ensures action is focused on the businesses who are responsible for the risk and those who are best placed to control it.

The council prioritises inspections in accordance with the guidance laid down in the code of practice. The priority for interventions in response to complaints about food business activities and food poisoning incidents will consider the nature and severity of the allegations.

6. Inspections and interventions

- 6.1. Under normal circumstances, inspections and interventions at food premises will be made without warning and at a time when a range of food handling practices may be observed. In instances where it is appropriate to do so, appointments may be made, for example, where it is prudent the proprietor or manager is on site to discuss particular issues or matters arising from a previous visit.
- 6.2. Where a food business is based at a domestic premises the law requires that at least 24 hours' notice of an inspection is given.
- 6.3. Officers will identify themselves unless for operational reasons the purpose of the visit is for surveillance purposes or to make a 'silent' test purchase. Officers will show their authorisation on request.
- 6.4. The officer will state the purpose of the inspection at the start of the visit. The main purpose of any food hygiene inspection is to establish if the food is being handled or produced hygienically, establish if it is safe to eat having regard to further processing and to identify foreseeable incidences of food poisoning or injury as a consequence of consuming the food.
- 6.5. At the conclusion of any intervention, the officer will offer to discuss their findings and will leave a completed Report of Intervention form. The officer may choose to write to the food business operator confirming their visit if the issued report requires further detail.
- 6.6. If contraventions of poor hygiene practices are found, or when there is low confidence that the business will address the issues, a revisit will be carried out.



7. Food sampling

- 7.1. Food, equipment and environmental sampling for microbiological examination or chemical analysis makes an important contribution to the protection of public health and food law enforcement. Samples may be obtained for microbiological examination or for chemical analysis.
- 7.2. The main aims and objectives of food sampling are to:
 - 7.2.1. Examine high risk foods that pose a hazard to the consumer because they may contain significant levels of pathogenic bacteria, harmful chemicals or physical contaminants
 - 7.2.2. Evaluate temperature control, food handling and processing practices at food premises in relation to hazard analysis, including evaluating the efficiency and effectiveness of cleaning and disinfection
 - 7.2.3. Help determine whether advice or enforcement action would be appropriate where it is suspected that poor practices and procedures exist
 - 7.2.4. Evaluate the effectiveness of stock rotation and control, and to assess the microbiological quality of food manufactured, distributed or retailed in the local area
 - 7.2.5. Identify contraventions of food safety legislation
 - 7.2.6. Investigate food poisoning outbreaks or individual notifications of food-borne illness
- 7.3. In deciding whether to sample a particular food consideration will be given to any sampling defined within legislation or guidance, or any further processing of that food by caterers or consumers, that will reduce or eliminate micro-organisms prior to consumption. The opinion of relevant the Food Examiner will be taken into consideration.
- 7.4. Depending on the sampling being carried out, the sampling officer may purchase food as would a member of the public. At other times, the sampling officer will declare themselves to the food business operator at the time. Full payment will be offered for all samples.
- 7.5. When a food sample has been examined/analysed, the sampling officer shall as soon as is reasonably practicable, notify the manufacturer/supplier or food business operator.

8. Complaints

- 8.1. The council will respond to and, where appropriate, investigate all complaints about food, food premises, food handling practices etc. The response will vary according to the nature of the allegation and its severity.
- 8.2. The council will only consider anonymous complaints if the complainant is independently verifiable as, in these circumstances, the identity of the complainant is not a relevant factor. If the officer decides there is sufficient information to proceed and it is in the public interest to do so, the complaint can proceed without a complainant.
- 8.3. In most cases, it will be appropriate to inform the business that a complaint has been received and the nature of the allegation. The details of the complainant will not be revealed to the business unless agreed with the complainant beforehand. Where it is thought necessary to protect the identity of the complainant advice will be sought from the council's legal team.
- 8.4. The council will respond to all reports of food poisoning received from the United Kingdom Health Security Agency (UKHSA), formally Public Health England, where a food business has been implicated. The response will vary according to the nature of the allegation.
- 8.5. The complainant will be kept informed of the progress of the investigation and notified of the eventual outcome unless the complaint was anonymous.
- 8.6. At the end of the investigation the business will be informed of the outcome and any further action to be taken by the council.



9. Food safety enforcement actions

- 9.1. It is important the full range of enforcement options are considered during all interventions. Authorised officers will judge the most appropriate course of action including enforcement action and all relevant information and evidence will be taken into account.
- 9.2. The choices of action are:
- no action
 - informal action and advice, including written warnings
 - statutory notices - Hygiene Improvement Notice, Hygiene Emergency Prohibition Notice or Remedial Action Notice
 - voluntary closure
 - service of Regulation 29 Certificate
 - detention and seizure of food
 - suspend or revoke an approval
 - issue a Simple Caution
 - prosecution
- The actions may be used singularly or, more usually, in combination.
- 9.3. Before formal action is taken, officers will provide the food business operator with an opportunity to discuss the circumstances of the case and, if possible, resolve points of difference, unless immediate action is required.
- 9.4. Where there are rights of appeal against formal action, advice on the appeal mechanisms will be clearly set out in writing at the time the action is taken.
- 9.5. If a primary authority partnership is in place, the officer must liaise with the primary authority about any proposed enforcement action except in circumstances where the need to act swiftly is critical.
- 9.6. No action
- Where there is full compliance with relevant legislation no further action will be required other than to issue a Report of Intervention.
- There will be circumstances where a contravention may not warrant action, or it may be inappropriate. Any discussion surrounding such cases will be documented.
- 9.7. Informal action
- Informal action to secure compliance with legislation includes offering verbal advice, the issue of a Report of Intervention at premises following an inspection, and the issue of a post inspection letter, also known as an informal written warning.
- At the conclusion of an inspection, the officer will discuss any contravention of food law discovered, any corrective action necessary, the timescale for remedy and any recommendations of good practice the officer considers appropriate.

A Report of Intervention will be issued at the conclusion of all programmed inspections and revisits. If there are only a small number of minor contraventions or recommendations, the inspection report alone may be sufficient. If there are more substantial issues to be addressed, a letter will also be issued, detailing any contraventions and the action to be taken. Informal advice or information pertinent to matters noted at the time may also be included within the letter.

Officers will use this approach as long as they believe this will achieve compliance with food safety legislation within a timescale that will protect the public health and ensure safe food production.

The circumstances when it is appropriate to use verbal and informal written warnings are:

- 9.7.1. The act or omission is not serious enough to warrant formal action
- 9.7.2. From the individual's/business' past history it can be reasonably expected that the warning will achieve compliance
- 9.7.3. The officer has confidence in the management of the business
- 9.7.4. The consequences of non-compliance will not pose a significant risk to public health

This is not a comprehensive list and there may be circumstances in which a warning will be more effective than a formal approach.

When an informal approach is used to secure compliance with food safety legislation any written documentation issued or sent to proprietors will:

- 9.7.5. Contain all the information necessary to understand what work is required and why it is necessary
- 9.7.6. Indicate the regulations contravened and the measures which will enable compliance with the law
- 9.7.8. Clearly distinguish between matters which are necessary to meet statutory requirements and those which are recommended practice
- 9.7.9. Copies of letters and any reports of the inspection will be sent to the registered or head office where this is not the premise visited

Food businesses that come within the scope of the Food Hygiene Rating Scheme will also be provided with details of the scheme, their rating, the right to reply, their right to request a re-rating inspection and how to appeal. There is a separate procedure covering the operation of the Food Hygiene Rating Scheme.

- 9.8. Hygiene Improvement Notices
Hygiene Improvement Notices will be served by authorised officers based on their opinion that there is a contravention of the law at the time of the visit or that there had been a contravention and that it is likely that the contravention will continue or be repeated.
It is appropriate to issue a Hygiene Improvement Notice in the following circumstances:

Formal action is proportionate to the risk to public health and there is a record of non-compliance with breaches of the food hygiene regulations and/or

The authorised officer has reason to believe an informal approach will not be successful

The notice will say what needs to be done, why and by when. Timescales will be realistic and details of how to appeal and to request an extension of time will accompany the notice.

Hygiene Improvement Notices will be signed by an appropriately authorised officer who has witnessed the contravention.

Non-compliance with a Hygiene Improvement Notice will generally result in prosecution.

9.9. Improvement Notices

Improvement Notices can be issued for contraventions of the allergen labelling requirements for non-pre-packed foods, and issues relating to allergen cross contamination.

If an authorised officer has reason to believe that an informal approach will not achieve a successful outcome, an Improvement Notice can be issued. Under normal circumstances they will liaise with the county council's Trading Standards Department, as they are an equivalent enforcing authority.

9.10. Hygiene Emergency Prohibition Notices

Authorised officers will consider the issue of Hygiene Emergency Prohibition Notices where the use of a premises, a process or the treatment of food represents or involves an imminent risk to health.

In considering the use of such notices, the prime consideration will be to protect public health. The following instances are examples of circumstances that could show a risk to health:

- 9.10.1. Premises or practices which seriously contravene food law and have been or are implicated in an outbreak of food poisoning
- 9.10.2. Serious infestation by rats, mice, cockroaches, birds or other vermin serious enough to result in the actual contamination of food or a significant risk of contamination
- 9.10.3. Very poor structural condition and poor equipment and/or poor maintenance of routine cleaning and/or serious accumulations of refuse, filth or other extraneous matter resulting in actual food contamination or a significant risk of food contamination
- 9.10.4. Drainage defects or flooding of the premises serious enough to lead to actual contamination of food or a significant risk of contamination
- 9.10.5. Use of equipment for the processing of high-risk foods that has been inadequately cleaned or disinfected or which is grossly contaminated and can no longer be properly cleaned
- 9.10.6. Dual use of complex equipment such as vacuum packers, slicers and mincers for raw and ready-to-eat foods

9.10.7. Serious risk of cross contamination

9.10.8. Failure to achieve sufficiently high processing temperatures

9.10.9. Operation outside critical control criteria, for example, incorrect pH of a product which may allow Clostridium Botulinum to grow

The list is not exhaustive and it may be a combination of factors that together represent an imminent risk to health.

The effect of the Hygiene Emergency Prohibition Notice is to immediately close the premises or prevent the use of equipment, or the use of a process or treatment. The authorised officer must apply to a magistrates' court for a Hygiene Emergency Prohibition Order within 3 days of the Hygiene Emergency Prohibition Notice being served, the day of service being day one. The officer must give the food business operator at least 24 hours' notice of the intention to apply to the court for a Hygiene Emergency Prohibition Order.

An officer may consider that a Voluntary Closure will achieve the same aims and is more appropriate in the circumstances. Voluntary procedures may be used at the instigation of a food business operator. Any agreement must be confirmed in writing with an undertaking not to re-open without the officer's prior approval.

The offer to voluntarily close will only be accepted where the authorised officer is satisfied there is no likelihood of the premises being used as a food business, or the use of equipment, or of a process without the express agreement of the officer.

9.11. Remedial Action Notices

Where a premises which is approved under Regulation (EC) 853/2004 is found to be non-compliant with food hygiene regulations authorised officers may issue a Remedial Action Notice under Regulation 9 of the Food Safety and Hygiene (England) Regulations 2013.

Circumstances which may lead to the issue of a Remedial Action Notice include:

9.11.1. The failure of any equipment or part of an establishment to comply with the requirements of the 'Hygiene Regulations' as defined by Regulation 2 of the Food Safety and Hygiene (England) Regulations 2013

9.11.2. The need to impose conditions upon or the prohibition of the carrying out of any process breaching the requirements of the regulations or hampering adequate health inspection in accordance with the regulations

9.11.3. Where the rate of operations of the business is detrimental to its ability to comply with the regulations

If a Remedial Action Notice is served the officer must also consider whether to use powers to detain food produced in the establishment where there are indications or suspicions that food is unsafe and therefore examination is necessary, including the taking of samples.

As soon as the authorised officer who served the notice is satisfied the specified action has been taken, the notice must be withdrawn by means of a further notice in writing.

9.12. Regulation 29 Certificate

When food has not been produced, processed or distributed in compliance with the Hygiene Regulations, a certificate under Regulation 29 of the Food Safety and Hygiene (England) Regulations 2013 may be served by an authorised officer.

Service of the certificate confirms the food fails to meet the hygiene regulations. The food must then be dealt with using powers of seizure under Section 9 of the Food Safety Act 1990 as food failing to comply with the food safety requirements.

9.13. Use of seizure and detention notices

Authorised officers can detain or seize food where they believe the food fails to comply with the food safety requirements.

9.13.1. Detention

Foodstuffs may be detained if an authorised officer has good reason to suspect that food does not satisfy food safety requirements. This will ensure that food is not used for human consumption and is either held where it is if security is not compromised, or moved to a specified place pending further information, for example, results of tests on samples.

Unless the circumstances require immediate action, any proposed action will be discussed in full with the owner or person in charge of the food so they are fully informed about the decision to detain and the progress of the investigations.

9.13.2. Seizure

If an authorised officer is in possession of evidence or adverse information concerning the foodstuffs, they may be seized and notice given that condemnation by a Justice of the Peace will be applied for. This will ensure that food is not used for human consumption and is either held where it is or not moved except to a specified place.

Food will be brought before a Justice of the Peace as soon as possible with a request for destruction. If the Justice of the Peace does not condemn the food, the owner may be entitled to compensation for any loss suffered.

Voluntary procedures to remove food that is not suitable for human consumption from the food chain can be used in some circumstances, either at the instigation of the owner of the food or at the suggestion of the authorised officer when the owner agrees that the food is not suitable for human consumption.

9.14. Suspend or withdraw an approval

Authorised officers have powers to withdraw or suspend approval or conditional approval of an establishment under Regulation 853/2004.

On discovery of non-compliance in establishments subject to approval officers must, before considering suspension or withdrawal, explore other enforcement options to control the food hazards.

Food business operators will be given a reasonable opportunity to address deficiencies and achieve compliance where this is appropriate.

The food business operator will be notified in writing of any decision to suspend or withdraw approval or conditional approval. The reasons for the suspension or withdrawal will be specified, together with the matters necessary to satisfy the requirements of the regulations.

The operator will be informed that activities requiring approval cannot be undertaken and will be made aware of their right of appeal.

9.15. Simple cautions

A simple caution is a formal warning that may be given to persons aged 18 or over who admit committing an offence. The simple caution scheme is designed to provide a means of dealing with offending without a prosecution where there is evidence of an offence.

Officers may consider the use of simple cautions as an alternative to prosecutions to:

- 9.15.1. deal quickly and simply with less serious offences where the offender has admitted the offence
- 9.15.2. divert less serious offences away from the courts, and reduce the chances of repeat offences
When a simple caution is under consideration, the following conditions must be fulfilled before it is offered:

9.15.3. there is sufficient evidence to provide a realistic prospect of conviction if the offender were to be prosecuted

9.15.4. the offender is over 18 years of age

9.15.5. the offender admits they have committed the crime

9.15.6. the offender agrees to be given the caution

Any decision to offer a simple caution will be made in consultation with the council's legal services department. In offering a simple caution, account will be taken of the Ministry of Justice Guidelines on Simple Cautions for Adult Offenders and the Code for Crown Prosecutors.

A caution will remain on record for a period of two years and may be cited in court should a further offence be committed and prosecuted during that time.

Where an offender declines to accept a simple caution, the case should be sent for prosecution.

9.16. Prosecution

Prosecution may be considered in addition to, or as a consequence of failure to comply with the above enforcement procedures.

The decision to prosecute is a significant one and will only be taken where that course of action is proportionate to the risk presented to public health by the contravention.

10. Amendments and review

Before initiating any prosecution proceedings, the council must be satisfied there is relevant, admissible, substantial and reliable evidence that an offence has been committed by an identifiable defendant. In all cases, legal advice will be sought before recommending any prosecution and any decision to prosecute will be ratified by the director of legal services

Home and primary authorities will be consulted where prosecutions are planned and due regard will be paid to the opinion of that authority.

Where a food business operator has been convicted of an offence the court may prohibit them from the management of a food business. The council, as the prosecutor, will draw the court's attention to this power where appropriate and provide the necessary information and evidence to support this action.

- 10.1. This policy will be reviewed by the SEHO on an annual basis and any minor amendments will be detailed in the Amendment Log.
- 10.2. Should the document require a major review, or such is required by the review of any supporting documentation, then the SEHO will undertake such action as necessary and consult on any changes.



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