



Committee for Health, Social Services and Public Safety
Food Hygiene Bill

A response by the Northern Ireland Hotels Federation to Food Hygiene Rating Scheme

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Northern Ireland Hotels Federation
The McCune Building, 1 Shore Road, Belfast BT15 3PG
Tel: 028 9077 6635 Fax: 028 9077 1899
www.nihf.co.uk

The Northern Ireland Hotels Federation (NIHF) is the representative trade body for the hotel and guesthouse sector. The Federation and its members are committed to delivering an excellent customer experience. The Federation and its members are committed to high standards and adhere to all the legal requirements in the provision of food.

The NIHF is responding to the The Food Hygiene Rating Bill that was introduced to the assembly on the 3rd November 2014. The system of rating hotels and food premises on a star rating is welcomed by the hotel industry who feel that hygiene and the provision of safe food is an imperative part of any food service operation. Hotels have scored highly in the rating system and the NIHF has worked with the FSA to raise awareness and standards.

However, the Federation has real concerns about the introduction of a mandatory displaying of the hygiene rating based on the following:

1. The scheme has no international /national standing and would need to have considerable investment to raise awareness at consumer level. The consumer has no awareness of what a three star rating means nor to our knowledge are they referring to the rating when making their food choices. Hotels are already graded in terms of service and structure. There would be concerns that another displayed rating scheme would only add confusion for the consumer. Indeed, we would add that after considerable consultation, hotel grading is not mandatory in terms of display or participation.
2. The dawn of digital reviews, such as Tripadvisor, considerably reduces the consumer reliance on government led rating schemes. Consumers use these methods on a regular basis and now base their choices on other customers ratings.
3. There already is a substantial level of bureaucracy and a robust legal framework within this area and adding to it will only increase costs and manpower requirements.
4. The vast array of premises involved and the nature of their business make the siting of and design of an appropriate label/sticker an impossible task. The current plastic sticker is not something that is in keeping with the standards of hotels trading at the higher grading levels. The nature of a hotel premises means that food is served in a range of locations within the hotel environs. A system of multiple stickering of hotels with the grading may not be possible and there would be concerns on how this would be interpreted in legal terms.
5. If displaying of your rating becomes mandatory, it would be the belief of the NIHF that considerable funds would have to be allocated to raise awareness about its role and meaning. This should include a full digital presence that would have to be continually updated. The NIHF would

have concerns that introducing such promotion would incur great cost and that this would have to be borne by the food service industry in the long run.

6. The costs and legal intricacies of a scheme that is subject to interpretative judgement would be of grave concern to our members.
7. The increase in costs for appeal and a fine system are not appropriate nor in the interests of the consumer. The fact that some 50% of businesses do not display the current rating is testament to the value attributed to the scheme at present.
8. Government has advised that they are seeking to reduce the legislative burden on business and the introduction of further mandatory schemes is contrary to this goal. The NIHF has recently worked with others in the sector to seek out reducing red tape and the federation disappointed that a mandatory display route has been advocated by the FSA.

The Northern Ireland Hotels Federation advocates that displaying of the food Hygiene rating remains voluntary at this time.