



Chartered
Institute of
Environmental
Health

Food Hygiene Rating Bill for NI

Comments on proposed bill submitted to Committee on
Health, Social Services and Public Safety

December 2014

The CIEH supports and endorses the aspirations of this bill and believes that the proposed legalisation will be of benefit both to consumers when selecting food premises from which to purchase food and in further improving hygiene standards in food premises across Northern Ireland.

However, we are also aware, through discussions with colleagues and members working within the Environmental Health Service in Northern Ireland, that there are some concerns about the detail within this Bill from within the Local Authority Environmental Health Service within Northern Ireland. These have been articulated within the CEHOG response which we would support, with the following further/additional comments.

- 1 Food Hygiene, which seeks ultimately to ensure that food intended for human consumption is safe to eat at the point of delivery, has been, and remains, an important element of health protection. Since the introduction of the Food Safety Order in 1991, and indeed prior to that, the District Council Environmental Health Service in Northern Ireland has been at the forefront of efforts to improve food hygiene standards. This has required the commitment of resources, skills, and expertise and those efforts have largely been a significant success. Overall compliance with food hygiene requirements within NI is high.

However, there are other significant public health areas related to food that arguably increasingly require addressing, and which the EH service is potentially well placed to contribute to. These include food standards (i.e. the composition and labelling of food), which are directly related to dietary health; food fraud (and the implications of the recent Elliott Review); and food sustainability and security.

- 2 We are aware that CEHOG and the EH Service is currently undertaking a review of its food function in light of the priorities alluded to above, and also in light of pending local government reorganisation. Whilst the service, like CIEH, is supportive of the FHRS and proposed bill, it is uncertain what impact a mandatory scheme will have on resource demand. It is important to bear in mind that the view of many environmental health practitioners (EHPs) working within the public service, is that the current scheme is effectively a "compliance" scheme. In other words a score of 5 represents full compliance. – not, as may be believed by the public, "excellence". This view, we believe, explains, and in many respects, justifies the views and comments expressed within the CEHOG response.

- 3 The committee will be aware that major local government reorganisation is currently underway within NI. Whilst CIEH has not been directly involved in the recent deliberations nor are we privy to the details in terms of proposals for future operational arrangements, what is fairly clear is that, although

there is a recognition and acceptance that the sector as a whole across NI will need to collaborate and work together, there are, in effect, no statutory mechanisms to ensure this.

With regards to the EH service specifically, and indeed food control, it is not yet clear how, if at all, previous roles and capacity, particularly the resources and capacity required to allow CEHOG and its associated subgroups to operate effectively that were inherent within the previous 26 council and Group model, will be accommodated within the new councils. If the capacity to deliver the work of CEHOG and its sub groups is not maintained, then we believe this has the potential to detrimentally affect the operation of this scheme – particularly the issue of consistency. Consistency of approach will, in our view, be vital to the effective and equitable implementation of this bill.

- 4 Bearing in mind comments from the preceding section, and also comments articulated within the CEHOG paper, how the scheme might affect resources is clearly an understandable concern. Experience from Wales would suggest that there may be additional strain placed on existing resources in the lead into the commencement of such a Bill. CEHOG have articulated concerns in this regard and particularly how this may potentially skew resources away from other equally important public health protection and improvement food related issues.

Whilst we would support the concept articulated within the CEHOG paper that Councils, and indeed the EH Service, should decide the priorities for the health and wellbeing of its citizens we believe that the food hygiene rating scheme must be applied across Northern Ireland as a whole or not at all. Although there is no suggestion otherwise, we do not believe it would be appropriate for individual councils to opt out.

- 5 We would encourage consideration of innovative flexible arrangements, in meeting additional resource demands that the scheme may generate – particularly in terms of revisits/re ratings. This could include for example the use of professional contractors or consultants that could be engaged if existing council resources are insufficient, for example due to either other priorities, emergencies, outbreaks etc.

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As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research.

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As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.

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