To: Interested parties

20 May, 2008

Reference: EPC 239

Dear Sir/Madam,

PUBLIC WRITTEN CONSULTATION
UK-wide 'scores On The Doors' scheme on hygiene standards in food businesses

Executive summary

1. The Food Standards Agency is seeking your views on proposals for establishing a UK-wide 'scores on the doors' (SOTD) scheme to provide consumers with information about hygiene standards in food businesses. The scheme will be supported by a centrally funded branding and marketing exercise and by a national promotional campaign to raise awareness of consumers and food businesses. Assessment of hygiene standards is undertaken by our local authority partners, and we are also seeking views on a support package to assist them in implementing and operating the UK-wide scheme.

2. Your comments are sought on:
   • the essential features of a UK-wide scheme, and on two different options for the scoring element of the scheme - a 'three-star, plus fail' (four-tier) system and a 'pass/improvement required' (two-tier) system (based on one currently being piloted in Scotland) - details are given at Appendix 1;
   • other options for the scoring element of the scheme, based on your experience of existing scoring systems, such as the various five-star systems that are being operated; and
   • the essential elements of the necessary support package for local authorities operating the scheme.

3. Your views are also sought on the draft Impact Assessment (IA) for the UK-wide scheme at Appendix 2 to this letter.

4. Responses are requested by 15 August 2008. Please state whether you are responding as a private individual or on behalf of an organisation/company (with a brief summary of the people it represents).

If you have received this consultation as a paper copy and would prefer to receive consultations on this subject by e-mail in future, please include a request to that effect in your e-mailed response. If you no longer wish to receive information on this subject please contact the person named in the box on page 2 of this letter.
Background

Food hygiene regulation in the UK

5. There are approximately 600,000 food business premises in the UK. This includes, for example, slaughterhouses, manufacturers, processors, packers, distributors, wholesalers, retailers, restaurants and other caterers. These businesses must comply with legislation on food hygiene, most of which has been agreed at European Community level.

6. Responsibility for monitoring compliance with and enforcement of the food hygiene legislation is (for the most part) delegated by central Government to 435 local authorities in the UK. In undertaking their duties, local authorities work in accordance with Food Law Codes of Practice (separate but parallel Codes apply in England, Scotland, Wales and Northern Ireland). Under the provisions of these Codes, the frequency of inspections and other activities designed to monitor and support compliance by businesses with the legal requirements is determined using a risk-rating (or interventions-rating) scheme - the ‘food hygiene interventions-rating scheme’ (see Appendix 3). This incorporates a ‘food hygiene scoring system’ and is based on the assessment of a number of criteria: the potential hazard; the level of (current) compliance with food hygiene legislation by the business; and, the confidence in management and in control systems. Those businesses that represent a higher risk are subject to more frequent interventions by local authorities than other businesses.

'Scores on the doors'

7. 'Scores on the doors' (SOTD) schemes are designed to provide consumers with information about the standards of hygiene at food business premises found by local authority officers when they undertake inspections to check compliance with the legal requirements. The score achieved reflects the inspection findings. The score is made available to the public via web-based systems, and may also be voluntarily displayed at the business premises. The primary purpose of SOTD is to empower consumers so that they may make informed choices about the places in which they choose to purchase food. Experience with current schemes, however, does suggest that this, in turn, can encourage businesses to raise their hygiene standards. There is evidence, for example,

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1 Additionally, there are approximately 195,000 holdings at primary production level.

2 Copies of the Codes are available at: http://www.food.gov.uk/enforcement/foodlaw/foodlawcop/. Please note that the Agency has recently undertaken a review of the Codes, which were last issued in 2006. The revised Code for England is due to be published shortly at the same link. Those for Scotland, Wales and Northern Ireland will follow in due course. Any references to the Codes in relation to the proposed UK-wide SOTD scheme are to the revised Codes (2008 Codes).
that schemes in Canada and the United States have contributed to reductions in case of food-borne disease (see the IA at Appendix 2).

8. SOTD schemes assess businesses against compliance with legal requirements on hygiene. In contrast, hygiene award schemes are designed to recognise businesses that have achieved standards of hygiene over and above that required in order to meet legal requirements. Such schemes can be compatible with, and run alongside, SOTD schemes. In Scotland, for example, the EAT safe hygiene award scheme\(^3\) runs in parallel with a SOTD scheme (the Food Hygiene Information Scheme), that is currently being piloted by some local authorities there.

9. In our *Strategic Plan to 2010 – Putting Consumer First* \(^4\) we made a commitment to make a recommendation for a national scheme by the end of 2008. In order to develop a recommendation, we sponsored a number of local authorities to participate in a variety of pilot schemes which began operating in 2006 and 2007.\(^5\) A number of other local authorities have also introduced SOTD schemes independently of the Agency in response to local needs. In total, there are now an estimated 196 local authorities operating or about to launch SOTD schemes and publishing information on web-based systems. These schemes share certain key features but vary as regards others.

10. The shared features of local schemes are that:

- the score given by the local authority to the business is based on an assessment of the level of compliance with food hygiene legislation (and in most, but not all, cases is directly related to the risk-rating scheme in the *Food Law Codes of Practice*);
- businesses that are not satisfied with the score that they have been given may appeal through the local authority’s formal complaints procedure; and,
- it is not mandatory for businesses to display their score (by means of a certificate or sticker) at their premises (though the information is made available to consumers via web-based systems).

11. The variety of local schemes differs with respect to:

- the type of businesses included within the scheme (some cover all food businesses but others only restaurants and cafes etc.);
- the number of tiers within the scheme (this varies from two up to six, and even where the number of tiers is the same, the criteria that must be met for each tier can differ);
- the symbols used to denote these tiers (e.g. stars, smiley faces, traffic lights) on certificates or stickers that may be displayed at the business premises or used on the website where the local authority publishes the information;
- policy as regards businesses requesting a re-inspection or re-visit by their authority in order to be re-scored - some provide a mechanism for this (in one case the business is charged for the re-inspection) but most do not.

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\(^3\) More information on EAT safe is available at: [http://www.eatsafe.gov.uk/](http://www.eatsafe.gov.uk/)

\(^4\) A copy of the Strategic Plan is available at: [http://www.food.gov.uk/multimedia/pdfs/strategicplan2010e.pdf](http://www.food.gov.uk/multimedia/pdfs/strategicplan2010e.pdf)

12. In order to assess these different features, we undertook a formal evaluation. The evaluation comprised two exercises: the first assessed consumer understanding of the schemes; and the second assessed the impact of SOTD on local authorities and on businesses. These exercises were completed earlier this year, and the final reports are published on our website.  

13. The findings of the evaluation were considered by the Agency’s Board at its meeting in March this year. The Board noted the strong support from consumer, industry and local authority stakeholders for a national scheme in order to avoid continued proliferation of different arrangements in different areas and to ensure consistency for businesses and clarity for consumers, and concluded that a UK-wide scheme would be desirable.

14. Following a wide-ranging discussion, the Board recommended that the Agency should consult on two options for the UK-wide scheme: a 'three-star, plus fail' (four-tier) scheme and a 'pass/improvement required' (two-tier) scheme based on that which is currently being piloted by local authorities in Scotland.  

15. In reaching this recommendation, the Board recognised that, of the existing schemes in operation, a substantial majority are designed around a six-tier ('five-star, plus fail') scoring system. However, the evaluation highlighted a number of difficulties associated with six-tier schemes: consumers are reluctant to buy food from premises below a 3-star score; businesses are unwilling to display a 2-star score even although this indicates that it is broadly compliant with the legal requirements; and businesses are unwilling to display scores which are perceived as 'failures' so there is little to be gained from having three 'fail' grades as is the case for several of the six-tier schemes. In addition, the evaluation highlighted the greater potential for consumer confusion from a scheme with so many tiers.

16. The evaluation also indicated that mechanisms for businesses to request re-inspections or re-visits for the purposes of re-scoring, and to appeal against scores given are key to an effective SOTD scheme, and that consistency in scoring is critical to ensuring that the scheme is operated fairly and equitably. The number of tiers in any scheme has implications for each of these elements. As the number of tiers increases, so too does the potential for inaccuracy and inconsistency in scoring as it is more difficult to distinguish between the narrow scoring categories. This, in turn, has the potential to place a higher level of burden on the re-scoring and appeals mechanisms with consequential resource implications for local authorities and the food businesses involved.

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17. We are committed to the wider Government Better Regulation agenda and the Board was also conscious of the need to avoid 'gold-plating' the legal requirements. As with some of the other key elements of SOTD schemes, the greater the number of tiers, the greater the possibility of 'regulatory creep' with upper tiers being linked to standards above full legal compliance.

18. At its meeting in May 2008 the Board re-visited the SOTD issue following representations by a number of local authorities currently operating schemes based on five-star scoring systems. In recognition of the fact that so many authorities use such systems, it was agreed that, as part of the consultation, stakeholders should be invited specifically to comment on other options for the scoring system that should underpin the UK-wide scheme, based on their experience of using these.9

Details of this consultation

Design of the UK-wide SOTD scheme

19. We would appreciate your comments and views on the best design for a UK-wide SOTD scheme. Two options are being considered for the scoring system that will underpin the scheme:

- 'three-star, plus fail' (four-tier) scheme;
- 'pass/improvement required' (two-tier) scheme based on the scheme currently being piloted in Scotland.

We have outlined how these two options might look at Appendix 1 and would value your comments on these.

20. Comments on other options for the scoring element of the scheme, based on your experience of existing scoring systems, such as the various five-star systems being operated, are also welcome.

21. Irrespective of the scoring system chosen, we propose that some common underpinning features will be incorporated into the UK-wide SOTD scheme, some of which we regard as essential safeguards for ensuring that businesses are treated fairly and equitably. In doing so, we have considered the following questions:

- What should the basic design of the UK-wide SOTD scheme be - should the scoring system have four tiers ('three-star, plus fail' design) or only two ('pass' or 'improvement required' design), and what criteria should be used for classification and what symbols and/or descriptors should be used to denote each tier?
- What businesses should be given a hygiene score?
- Where will consumers find out what the scores are for the businesses from which they purchase their food?

9 The minutes of the May 2008 Board meeting will be available in due course on the Agency's website at: http://www.food.gov.uk/aboutus/ourboard/boardmeetings/
• Should businesses be allowed to request the local authority to undertake a re-inspection or to re-visit them (before their regular inspection is due) in order to be re-scored?

• Should businesses be able to appeal against the score given?

22. Our objectives are to develop a scheme that will:

• be clear and easy to understand by consumers and allow them to make informed choices about the places in which they purchase food;

• as a consequence, provide businesses with recognition and an incentive to comply with the requirements in food hygiene legislation;

• be simple and practical to operate by the local authorities that decide to implement it so that it may be applied consistently to businesses; and

• include the safeguards necessary to ensure that businesses are treated fairly and equitably.

23. Your comments on the questions at paragraph 21 are welcome. We have also included some more specific questions at Appendix 1 and would be grateful if you would consider these also. Where you are commenting on options other than the two recommended options for the underpinning scoring system for the UK-wide scheme, please address the same questions, providing supporting evidence where this is available.

24. We will use your views and comments as the basis of making a recommendation to our Board as to which design best fits our objectives. The Board will consider this recommendation in the autumn with a view to a UK-wide scheme being launched in early 2009.

Design of the local authority support package

25. It will not be mandatory for local authorities to implement the UK-wide SOTD scheme (or indeed have a SOTD scheme at all) so we are conscious that its success will very much depend on their support and involvement. We are, therefore, committed to developing a support package to help them to implement the scheme. We want to design this package to assist those authorities that do not already have a scheme in place and also those that may be migrating to the UK-wide scheme from an existing scheme.

26. We envisage that the key elements of this package will be:

• Guidance - We propose to develop and issue guidance covering: the practical operation of the UK-wide scheme (for the local authority officials that will be responsible for scoring businesses) with the aim of ensuring consistency; general information on the web-based platform that will support the scheme; and marketing and promotional issues.

• Training - We propose to provide a programme of free 'start-up' training and develop associated materials for local authorities that decide to implement and operate the UK-wide scheme.
• **Web-based platform** - We are committed to ensuring that a web-based platform is in place to support the UK-wide scheme that maximises accessibility and understanding by consumers.

• **IT assistance** - We are currently considering different options for the web-based platform, and will ensure that assistance is available to local authorities on IT issues that may arise in relation to linking with this.

• **Business and consumer awareness and understanding** - This will be critical to the success of the UK-wide scheme and will present particular challenges in those areas where the local authority wishes to migrate from an existing scheme to the UK-wide scheme. We will take these challenges into account in developing the branding and marketing package for the UK-wide scheme and in designing our national promotional campaign.

• **SOTD Stakeholder Group** - We propose to establish a Stakeholder Group comprising representatives from consumer organisations, food industry bodies and from local authorities. This Group will oversee the development of the UK-wide scheme and will provide a forum for future discussion of SOTD issues and trouble-shooting of any problems arising from operation of the scheme once in place.

27. **We would value your comments and views on any aspect of the proposed support package and would be grateful if you would also consider the following questions:**

• **What other elements should the local authority support package include?**

• **Are there any other issues that the guidance and training should cover?**

• **Can you foresee any particular IT issues?**

• **For those local authorities that may consider migrating from an existing scheme, can you foresee any particular technical or other difficulties?**

**Impact assessment (IA)**

28. A draft IA for establishing and operating a UK-wide SOTD scheme is enclosed. The purpose of the IA is to assess and record the likely costs and benefits of such a scheme for consumers, businesses, local authorities and the Agency.

29. **Your comments on any aspect of the draft IA are welcome. We would also welcome your views on the specific points and questions that are highlighted in the draft IA itself. This will help us assess, in particular, the financial impact on both local authorities and businesses of introducing a UK-wide SOTD scheme.**

**Enquiries**

30. General enquiries relating to the contents of this letter should be addressed to Philip Flaherty. His contact details are given in the box on page 2 of this letter.

**Publication of personal data and confidentiality of responses**

31. In accordance with the FSA principle of openness our Information Centre at Aviation House will hold a copy of the completed consultation. Responses will be open
to public access upon request. The FSA will also publish a summary of responses, which may include personal data, such as your full name and contact address details. If you do not want this information to be released, please complete and return the **Publication of Personal Data Form** (available on the main consultation page). Return of this form does not mean that we will treat your response to the consultation as confidential, just your personal data.

32. In accordance with the provisions of the Freedom of Information Act 2000 and the Environmental Information Regulations 2004, all information contained in your response may be subject to publication or disclosure. If you consider that some of the information provided in your response should not be disclosed, you should indicate the information concerned, request that it is not disclosed and explain what harm you consider would result from disclosure. The final decision on whether the information should be withheld rests with the Agency. However, we will take into account your views when making this decision.

33. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

**Further information**

34. A list of interested parties to whom this letter is being sent is provided. Please feel free to pass this document to any other parties with an interest in the subject matter, or send us their full contact details and we will arrange for a copy to be sent to them direct.

35. A copy of this consultation package is available on our website at [www.food.gov.uk](http://www.food.gov.uk), where a summary of the responses received will be published by the end of November 2008.

36. This consultation has been prepared in accordance with the Cabinet Office’s Code of Practice on Consultation. This is available at: [http://bre.berr.gov.uk/regulation/consultation/code/index.asp](http://bre.berr.gov.uk/regulation/consultation/code/index.asp).

37. For details about the consultation process (not about the subject matter of the consultation), please contact the Food Standards Agency Consultation Co-ordinator, Room 115B, Aviation House, 125 Kingsway, London, WC2B 6NH. Tel: 020 7276 8630.

38. Criterion 6 of the Cabinet Office Code of Practice states that a consultation must follow better regulation best practice, including carrying out an Impact Assessment. Please see the attached draft IA.
Comments on the consultation process itself

39. We are interested in what you thought of this consultation and would therefore welcome your general feedback on both the consultation package and overall consultation process. If you would like to assist us to improve the quality of future consultations, please feel free to share your thoughts with us by using the Consultation Feedback Questionnaire which is enclosed at Appendix 7.

40. If you would like to be included on future Food Standards Agency consultations on other topics, please advise us of those subject areas that you might be specifically interested in again by using the Feedback Questionnaire.

41. If any of the mailing information used to send you this letter has changed, please advise us direct using the Feedback Questionnaire.

42. Thank you for participating in this public consultation.

Yours faithfully,

Catriona Stewart
Official Controls and Enforcement Policy Branch

Appendices

Appendix 1: Design of a UK-wide SOTD scheme
Appendix 2: Impact Assessment (IA)
Appendix 3: 'Food hygiene intervention rating scheme' (in: Food Law Codes of Practice)
Appendix 4: Publication of Personal Data Form (available at food.gov.uk/consultations/consulteng/2008/sotdeng08)
Appendix 5: List of interested parties
Appendix 6: Cabinet Office Consultation Criteria
Appendix 7: Consultation Feedback Questionnaire
APPENDIX 1: DESIGN OF A UK-WIDE ‘SCORES ON THE DOORS’ SCHEME

Introduction

We are seeking your views and comments on the best design for a UK-wide SOTD scheme. Two options are being considered for the scoring system that will underpin the scheme. These are:

- **a ‘three-star, plus fail’ (four-tier) scheme**, based on a recommendation made to the Agency's Board following an evaluation of a variety of different SOTD schemes;¹ and

- **a ‘pass/improvement required (two-tier) scheme**, based on the *Food Hygiene Information Scheme* (FHIS) that is currently being piloted in Scotland.²

Your comments on other options for the underpinning scoring system, based on your experience of existing scoring systems, such as the various five-star systems being operated, are also welcome.

Our objectives for a UK-wide SOTD scheme are that it should:

- be clear and easy to understand by consumers and allow them to make informed choices about the places in which they purchase food;

- as a consequence, provide businesses with recognition and an incentive to comply with the requirements in food hygiene legislation;

- be simple and practical to operate by the local authorities that decide to implement it so that it may be applied consistently to businesses; and

- include the safeguards necessary to ensure that businesses are treated fairly and equitably.

The basic designs of the two options being considered are outlined below together with proposals for some additional features which we propose to incorporate irrespective of which option is chosen.

**Your comments on any aspect of these proposals are welcome.**

*We have included some specific questions and your answers to these will help us to assess which design and features best meet our objectives for a UK-wide SOTD scheme.*

*Where you are commenting on options other than the two recommended options for the underpinning scoring system for the UK-wide scheme, please address the same questions, providing supporting evidence where this is available.*

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² The pilot scheme in Scotland, the *Food Hygiene Information Scheme*, was developed by a Stakeholder Group (comprising consumer, industry and local authority representatives) set up by the Food Standards Agency in Scotland and launched in November 2006. The scheme is based on a pass/improvement required format. ‘Improvement required’ is equivalent to failure to comply with food hygiene legislation. Further detailed information on the scheme and about progress since launch is contained in reports published on the Agency’s website at http://www.food.gov.uk/scotland/safetyhygienescot/foodhygieneinfoscot/fhisreport and http://www.food.gov.uk/scotland/safetyhygienescot/foodhygieneinfoscot/fhisreportoneyearon
What should the basic design of the UK-wide SOTD scheme be - should the scoring system have four tiers ('three-star, plus fail' design) or only two tiers ('pass' or 'improvement required' design), and what criteria should be used for classification and what symbols and/or descriptors should be used to denote each tier?

'Three-star, plus fail' (four-tier)

- Assessment is based on the level of compliance by the business with the European Community Regulations on food hygiene.
- This assessment is linked closely to the 'food hygiene interventions-rating scheme' in the *Food Law Codes of Practice* - this is reproduced at Appendix 3 to this consultation letter. This scheme is used to determine the frequency of regulatory activity at food establishments and is based on risk - it incorporates a 'food hygiene scoring system'.
- The assessment is based around three elements of the 'food hygiene scoring system':
  - the level of current compliance based on an assessment of the food hygiene and safety procedures in place (e.g. food handling practices, temperature control).
  - the level of current compliance based on the structure of the establishment (e.g. cleanliness, ventilation, lighting).
  - the likelihood of the level of compliance observed being maintained in the future. This is based on the local authority officer's confidence in the management of the business and the control procedures in place, and will be influenced by the track record of the business, the attitude of the management, the technical knowledge available within the business, and satisfactory food safety management systems being in place.
- Taken together, businesses can score from zero to 80, where the lower the score, the better the compliance.
- The initial score may be given only following a 'full inspection' (as described in the *Food Law Codes of Practice*).
- This option differentiates four tiers of compliance. The scale ranges from 'full compliance' at the top, through a 'broadly compliant' tier, an 'improvement required' tier to a 'fail'.
- Where any business does not achieve a 'full compliance' score, the local authority will (in line with the *Food Law Codes of Practice*) communicate in writing to the business, the nature of each non-compliance and the necessary remedial action. In this way, every business that does not achieve 'full compliance' will be clear about the steps required to do so.
- The star scoring for each of these tiers and the descriptors for them are shown below.
<table>
<thead>
<tr>
<th>Food hygiene rating system score</th>
<th>Descriptor</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total - 0 to 15</td>
<td>Good - full compliance with the requirements of the Regulations on food hygiene, with a satisfactory food safety management system.</td>
<td>Three star</td>
</tr>
<tr>
<td>Individual scores - maximum of 5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total - 20 to 30</td>
<td>Satisfactory - broadly compliant with the requirements of the Regulations on food hygiene but some minor issues requiring improvement.</td>
<td>Two stars</td>
</tr>
<tr>
<td>Individual scores - maximum of 10</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total - 35 to 45</td>
<td>Basic - improvements are required.</td>
<td>One star</td>
</tr>
<tr>
<td>Total - 50 to 80</td>
<td>Fail - failure to meet minimum requirements and formal action being taken by the local authority.</td>
<td>No stars</td>
</tr>
</tbody>
</table>

‘Pass/improvement required’

- The assessment is also based on compliance with the European Community Regulations on food hygiene.

- In this case, the scoring system is not wholly dependent on the *Food Law Codes of Practice*. The general direction and guidance given to local authorities is followed in assessing compliance against the requirements of the Regulations on food hygiene but there is no direct dependency on the 'food hygiene interventions-rating scheme' set out in the *Codes*. The 'pass/improvement' required option is designed to assess compliance at the time of inspection.

- Assessment is made against all aspects of the Regulations including hygiene practices, the structure of the establishment, equipment and implementation of food safety management systems - i.e. current compliance level.

- The initial score may be given only following a full inspection (as defined in the *Food Law Codes of Practice*).

- The scheme is designed around the definition of a ‘pass’ and this represents 'satisfactory compliance' with the Regulations on food hygiene, with any non-compliances being minor in nature only, not recurring and not critical to food safety.

- Any business that does not meet the 'pass' standard falls into the 'improvement required' category - the local authority will (in line with the *Food Law Codes of Practice*) communicate in writing, the nature of each non-compliance and the necessary remedial action. In this way, every business that does not meet the ‘pass’ standard will be clear about the steps required to achieve this.

- Minor non-compliances that are not critical to food safety are differentiated from more significant non-compliances. Such minor non-compliances should not affect consumer safety but are legal requirements and notified to the business with the normal expectation that they will be rectified as a matter of course without the need for a re-inspection. However, if such minor non-compliances are found to have not been rectified as expected, at a subsequent inspection then the business will not be assessed as a ‘pass’.
**Consultation questions**

How easy is it to understand each of the schemes? Which is the easiest?

How useful are the descriptors in telling you what the hygiene standards in a food business are? Do you prefer one or other of the schemes? If so, why?

For the 'three-star, plus fail' option, do the scores adequately reflect the text descriptions 'Good', 'Satisfactory', 'Basic', 'Fail'? What symbols should be used to denote the scores?

For the 'pass/improvement required' scheme, is it sufficiently clear when a 'pass' would be achieved?

Are both the schemes fair to businesses?

Are both schemes capable of being consistently applied? Which would be the simpler and more practical to operate?

Is either one of the schemes better at providing an incentive to businesses to meet the legal requirements? If so, what makes your choice better?

Do you agree that the initial score may be given only following a full inspection? If not, why not?

Do you think the scheme should be based around compliance with the Regulations on food hygiene only at the time of the inspection or should the likelihood of this level of compliance being maintained in the future also be considered? Please explain your answer.
What businesses should be given a score?

For both options, we propose that the UK-wide scheme includes all businesses supplying food directly to consumers (e.g. cafés, bars, restaurants take-aways, supermarkets and other retailers) but not to those businesses that have no direct sales (such as manufactures, packers, slaughterhouses etc.).

We recognise that in some very specific and limited cases, it may not be appropriate to include businesses supplying consumers where these business represent a low risk to public health and which are not generally recognised by consumers as being food businesses. Examples of this include: certain childminders working from private addresses; or hairdressers providing light refreshments.

We also recognise that within single premises, there may be more than one food business, e.g. a coffee shop operating within a supermarket. These different businesses are required to register separately with their local authorities and we propose that each registered business should receive its own score on the door.

Consultation questions

Do you agree with the proposed scope?

If not, do you think it should be restricted to certain types of businesses only or do you think it should be extended to other types of businesses that do not supply direct to consumers? In either case, please explain your answer and say which types of businesses should be excluded or included.

Do you think there should be any exemptions to the proposed scope? If so, can you please tell us what businesses you think should be exempted and why?

How should any exemptions be agreed? For example, should this be UK-wide or should they be considered by local authorities and agreed with the business concerned on a case-by-case basis?

If an ‘exempted business’ asks to be included, should this be permitted? Please explain your answer.

If the hygiene standards of the ‘exempted business’ fall below a certain standard, should the exemption be lifted? Please explain your answer.

Should ‘exempted businesses’ be listed on the web-based SOTD site as ‘exempt’ or simply missed out? Please explain your answer.

Do you agree that where there are a number of separately registered food businesses within a single establishment, each should have its own score? Please explain your answer.

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3 This is consistent with the scope of FHIS being piloted in Scotland.
Where will consumers find out what the scores are for the businesses from which they buy their food?

For both options, we propose that the most recent score for all businesses covered by the scheme should be made available via a web-based platform (we are currently considering the options for doing this).

We also propose that for both options certificates and/or stickers specifying a business's score should be provided so that the information may be displayed at the premises in a prominent place that is easily visible to consumers. We propose that this display at the premises be voluntary.\(^4\) We believe that through the planned national promotional campaigns, we will increase consumer awareness such that they will make their own judgements about a business failing to display its score. We believe that this will encourage businesses to display scores. We do, however, propose to keep this voluntary approach under review.

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**Consultation questions**

Do you agree that display of the score at the premises by means of a sticker or a certificate is the most accessible way for consumers to obtain information on scores? If not, why not?

Do you agree that display of the score at the premises by means of a sticker or a certificate should be voluntary? If not, why not?

Do you agree that all scores should be available via the web-based platform that will be developed? If not, why not?

Do you agree that only the most recent score given should be provided? If not, why not?

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\(^4\) This is consistent with the scope of FHIS being piloted in Scotland.
Should businesses be allowed to request the local authority to undertake a re-inspection or to re-visit them (before their regular inspection is due) in order to be re-scored?

We believe that allowing businesses to request re-inspection and re-scoring where standards have improved will ensure that consumers have the most up-to-date information on standards. It will also be an incentive for businesses to improve their standards and will avoid a business being penalised by a score which is rendered out-of-date after standards have been improved.

On balance, we believe that a key feature of the UK-wide scheme whichever option is adopted will be a mechanism for re-scoring (it is a feature of some existing schemes including the Food Hygiene Information Scheme being piloted in Scotland\(^5\)). We are conscious that this mechanism must be flexible to allow re-scoring following a re-visit where appropriate and following re-inspection where necessary, and that it should be sustainable in terms of local authority resources (the potential burden on local authorities is explored in the Impact Assessment - see Appendix 2 of this consultation package).

One way of offsetting any costs to local authorities for re-inspections or re-visits would be to charge the business concerned. We do not believe that such an approach is the way forward given that it could represent a burden, and disincentive to a business which seeks to improve its standards and be re-scored.

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**Consultation questions**

*Do you agree that the UK-wide SOTD scheme should include a mechanism for re-scoring? If not, could you please explain why?*

*Should there be a time limit following the request from the business within which the re-scoring must take place? If not, why not? If yes, how long should this be?*

*Should re-scoring only be permitted following a re-inspection or a re-visit or may documentary evidence from the business (e.g. invoices for work completed, photographs etc.) be sufficient in certain circumstances? If yes, in what circumstances?*

*Should the circumstances in which re-inspections, re-visits, documentary evidence are acceptable be defined or should this judgment be left to individual local authorities? Please explain your answer.*

*Do you agree that businesses should not be charged for any re-inspections or re-visits undertaken at their request for the purposes of re-scoring them under the SOTD scheme? If not, why not?*

---

\(^5\) FHIS includes a right to all businesses that do not meet the 'pass' standard to request a re-inspection within seven days of notifying the local authority that all non-compliances identified at the original inspection have been rectified.
Should businesses be able to appeal against the score given?

For both options, we propose that a mechanism is included for business to appeal the score that they have been given. For all those schemes currently operating (including the Food Hygiene Information Scheme in Scotland), appeals are made through the relevant local authority’s formal complaints procedure. Where complaints are not resolved through this mechanism, they may be referred to the Local Government Ombudsman. As this approach has been operated successfully, we propose that this approach should be applied in the case of the UK-wide scheme.

Consultation questions

Do you think that a business should be notified of their score and given a period of time to query or challenge this before it is posted on the web-based platform?

Do you agree that an appeal mechanism should be available?

Do you agree that appeals should be handled through the relevant local authorities’ complaints procedure?

If not to the above, what other mechanism/s would you suggest and why?
What is the problem under consideration? Why is government intervention necessary?
’Scores on the doors' (SOTD) schemes are designed to provide consumers with information about standards of hygiene in food businesses and to empower them to make informed choices. Currently, there are a large number of different local authority SOTD schemes operating in the UK. An evaluation of a variety of these has shown that there is strong support for a UK-wide scheme to avoid continued proliferation of different schemes and the potential for confusion that this may cause.

What are the policy objectives and the intended effects?
The aim is to establish a UK-wide SOTD scheme which may be implemented by local authorities across the UK. The objectives of the UK-wide scheme are: to allow consumers to make informed choices about the places in which they purchase food; and, as a consequence, to give businesses an incentive to comply with food hygiene legislation (and, in turn, to contribute to a reduction in the public health burden of food-borne diseases).

What policy options have been considered? Please justify any preferred option.
Three options are being considered: 1 - allow continuing organic growth of SOTD schemes (effectively allowing further proliferation of different types of scheme); 2 - proceed with the establishment of a 'three-star, plus fail (four-tier) UK-wide SOTD scheme securing local authority 'buy-in' to a UK-wide approach; 3 - proceed with the establishment of a 'pass/improvement required' (two-tier) UK-wide SOTD scheme securing local authority 'buy-in' to a UK-wide approach.
Option 2 and Option 3 have equal preference - the final choice is dependent on stakeholder views expressed during the consultation.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? There will be a review of the operation of the UK-wide SOTD scheme after a two-year implementation period.
## Summary: Analysis & Evidence

<table>
<thead>
<tr>
<th>Policy Option: 1</th>
<th>Description: Allow continuing organic growth of SOTDs schemes (effectively allowing further proliferation of different types of scheme)</th>
</tr>
</thead>
</table>

### ANNUAL COSTS

<table>
<thead>
<tr>
<th>Description and scale of key monetised costs by ‘main affected groups’</th>
<th>Local authorities (LAs): £86k cost of initial training; £19k for ongoing training; £191k to handle complaints; between £0 and £639k to issue certificates.</th>
<th>Businesses: £1,345k for familiarisation with SOTDs.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description and scale of key non-monetised costs by ‘main affected groups’</td>
<td></td>
<td></td>
</tr>
<tr>
<td>One-off (Transition) Yrs</td>
<td>£ 1,431k</td>
<td></td>
</tr>
<tr>
<td>Average Annual Cost (excluding one-off)</td>
<td>£ 52k - 212k</td>
<td></td>
</tr>
<tr>
<td><strong>Total Cost (PV)</strong></td>
<td>£ 1,641k – 2,280k</td>
<td></td>
</tr>
</tbody>
</table>

### ANNUAL BENEFITS

<table>
<thead>
<tr>
<th>Description and scale of key monetised benefits by ‘main affected groups’</th>
<th>LAs: £10k from reduced Freedom of Information (FoI) requests. Consumers: £5,654k from reduction in burden of food-borne diseases.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description and scale of key non-monetised benefits by ‘main affected groups’</td>
<td>Consumers empowered to make more informed choices, however, they may be misled if a number of different schemes are in operation. LAs and businesses could benefit from a reduction in inspections brought about by improved hygiene standards in food premises.</td>
</tr>
<tr>
<td>One-off</td>
<td>£ 0</td>
</tr>
<tr>
<td>Average Annual Benefit (excluding one-off)</td>
<td>£1,146k</td>
</tr>
<tr>
<td><strong>Total Benefit (PV)</strong></td>
<td>£ 5,663k</td>
</tr>
</tbody>
</table>

### Key Assumptions/Sensitivities/Risks

- Time taken for business managers to familiarise themselves with SOTDs: one hour. Sustained 1% decrease in burden of food-borne disease in LAs which implement SOTD’s following its launch.

### Price Base

- Year 2008
- Time Period: Years 4

### Net Benefit Range (NPV)

- £ 3,383k – 4,022k

### NET BENEFIT (NPV Best estimate)

- £ 3,703k

### What is the geographic coverage of the policy/option?

- UK

### On what date will the policy be implemented?

- From early 2009

### Which organisation(s) will enforce the policy?

- Local Authorities

### What is the total annual cost of enforcement for these organisations?

- £ 74k – 234k

### Does enforcement comply with Hampton principles?

- Yes

### Will implementation go beyond minimum EU requirements?

- No

### What is the value of the proposed offsetting measure per year?

- £ N/A

### What is the value of changes in greenhouse gas emissions?

- £ Zero

### Will the proposal have a significant impact on competition?

- No

### Annual cost (£-£) per organisation (excluding one-off)

- Micro: 0
- Small: 0
- Medium: 0
- Large: 0

### Are any of these organisations exempt?

- No
- No
- N/A
- N/A

### Impact on Admin Burdens Baseline (2005 Prices)

- Increase of £ 0
- Decrease of £ 0
- Net Impact: £ 0
### Summary: Analysis & Evidence

**Policy Option:** 2  
**Description:** Proceed with establishment of a UK-wide 'scores on doors' 'three-star, plus fail' scheme

#### ANNUAL COSTS

<table>
<thead>
<tr>
<th>Description and scale of key monetised costs by 'main affected groups'</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAs: £41k for on-going training; £442k to handle complaints; £0-£1,478k to issue certificates. Food Standards Agency (FSA): £840k for publicity, £225k one-off cost of initial training. Businesses: £3,513k for familiarisation with SOTDs.</td>
</tr>
</tbody>
</table>

<table>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>ANNUAL BENEFITS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description and scale of key monetised benefits by 'main affected groups'</td>
</tr>
<tr>
<td>LAs: £22k from reduced FoI requests. Consumers: £12,320k from reduction in burden of food-borne diseases.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Description and scale of key non-monetised benefits by 'main affected groups'</th>
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<tbody>
<tr>
<td>Consumers further empowered to make more informed choices. LA's and businesses could benefit from a reduction in inspections brought about by improved hygiene standards in food premises.</td>
</tr>
</tbody>
</table>

**Key Assumptions/Sensitivities/Risks** Sustained 1% decrease in burden of food-borne diseases in LAs which implement SOTD's following its launch; Publicity costs, informational leaflets and development of IT solutions: £900,000; Time taken for business managers to familiarise themselves with SOTDs: one hour.

**Price Base Year:** 2008  
**Time Period Years:** 4  
**Net Benefit Range (NPV):** £5,803k – 7,281k  
**NET BENEFIT (NPV Best estimate):** £6,542k

- What is the geographic coverage of the policy/option?  
  - UK
- On what date will the policy be implemented?  
  - 2009
- Which organisation(s) will enforce the policy?  
  - Local authorities
- What is the total annual cost of enforcement for these organisations?  
  - £121k – 490k
- Does enforcement comply with Hampton principles?  
  - Yes
- Will implementation go beyond minimum EU requirements?  
  - No
- What is the value of the proposed offsetting measure per year?  
  - £ N/A
- What is the value of changes in greenhouse gas emissions?  
  - £ Zero
- Will the proposal have a significant impact on competition?  
  - No
- Annual cost (£-£) per organisation (excluding one-off)  
  - Micro: 0  
  - Small: 0  
  - Medium: 0  
  - Large: 0
- Are any of these organisations exempt?  
  - No

**Impact on Admin Burdens Baseline (2005 Prices):**  
| Increase of | £0 | Decrease of | £0 | Net Impact | £0 |

**Key:**  
- Annual costs and benefits: Constant Prices  
- (Net) Present Value
**Summary: Analysis & Evidence**

**Policy Option:** 3  
**Description:** Proceed with the establishment of a UK-wide ‘scores on the doors’ ‘pass/improvement required’ scheme

### ANNUAL COSTS

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#### One-off (Transition) Yrs

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<table>
<thead>
<tr>
<th>Yrs</th>
<th>£ 3,738k</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td></td>
</tr>
</tbody>
</table>

### Average Annual Cost (excluding one-off) £ 331k – 700k

#### Total Cost (PV) £ 5,061k – 6,538k

### ANNUAL BENEFITS

<table>
<thead>
<tr>
<th>Description and scale of key monetised benefits by ‘main affected groups’</th>
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#### One-off Yrs

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</table>

<table>
<thead>
<tr>
<th>Yrs</th>
<th>£ 0</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td></td>
</tr>
</tbody>
</table>

### Average Annual Benefit (excluding one-off) £ 3,085k

#### Total Benefit (PV) £ 12,342k

### Other key non-monetised costs by ‘main affected groups’

<table>
<thead>
<tr>
<th>Description and scale of key monetised benefits by ‘main affected groups’</th>
</tr>
</thead>
<tbody>
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#### Key Assumptions/Sensitivities/Risks

Sustained 1% decrease in burden of food-borne diseases in LAs which implement SOTD’s following its launch; Publicity costs, informational leaflets and development of IT solutions: £900,000; Time taken for business managers to familiarise themselves with SOTDs: one hour.

### Price Base

<table>
<thead>
<tr>
<th>Year</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time Period Years</td>
<td>4</td>
</tr>
<tr>
<td><strong>Net Benefit Range (NPV)</strong> £ 5,803k – 7,281k</td>
<td></td>
</tr>
<tr>
<td><strong>NET BENEFIT (NPV Best estimate)</strong> £ 6,542k</td>
<td></td>
</tr>
</tbody>
</table>

### What is the geographic coverage of the policy/option? UK

### On what date will the policy be implemented? 2009

### Which organisation(s) will enforce the policy? Local authorities

### What is the total annual cost of enforcement for these organisations? £ 121k – 490k

### Does enforcement comply with Hampton principles? Yes

### Will implementation go beyond minimum EU requirements? No

### What is the value of the proposed offsetting measure per year? £ N/A

### What is the value of changes in greenhouse gas emissions? £ Zero

### Will the proposal have a significant impact on competition? No

### Annual cost (£-£) per organisation (excluding one-off) Micro 0 Small 0 Medium 0 Large 0

### Are any of these organisations exempt? No No N/A N/A

### Impact on Admin Burdens Baseline (2005 Prices) (Increase - Decrease)

<table>
<thead>
<tr>
<th>Increase of</th>
<th>£ 0</th>
<th>Decrease of</th>
<th>£ 0</th>
<th>Net Impact</th>
<th>£ 0</th>
</tr>
</thead>
</table>

**Key:** Annual costs and benefits: Constant Prices (Net) Present Value
1. PURPOSE AND INTENDED EFFECT OF MEASURE

1.1 'Scores on the doors' (SOTD) schemes are designed to provide consumers with information about standards of hygiene in food businesses and to empower them to make informed choices. Experience with current schemes suggests that, in turn, they can encourage businesses to raise their hygiene standards.

1.2 Currently, there are a number of different SOTD schemes operating in the UK and an evaluation of these has shown that there is strong support for a UK-wide scheme. The aim of introducing such a scheme is to avoid the continued proliferation of different schemes and the potential for confusion that this may cause. The objectives are to develop a scheme that will:

- be clear and easy to understand by consumers and allow them to make informed choices about the places in which they purchase food;
- as a consequence, provide businesses with recognition and an incentive to comply with the requirements in food hygiene legislation;
- be simple and practical to operate by the local authorities that decide to implement it so that it may be applied consistently to businesses; and
- include the safeguards necessary to ensure that businesses are treated fairly and equitably.

2. BACKGROUND

Food hygiene regulation in the UK

2.1 There are approximately 600,000 food business premises in the UK. This includes slaughterhouses, cutting plants, manufacturers, processors, packers, importers, distributors, wholesalers, retailers, restaurants and caterers. These businesses must comply with legislation on food hygiene, most of which has been agreed at European Community level.

2.2 Responsibility for monitoring compliance with and enforcement of the food hygiene legislation is (for the most part) delegated by central Government to 435 local authorities in the UK. In undertaking their duties, local authorities work in accordance with Food Law Codes of Practice (separate but parallel Codes apply in England, Scotland, Wales and Northern Ireland). Under the provisions of these Codes the frequency of inspections and other activities designed to monitor and support compliance by businesses with the legal requirements is determined using a risk-rating (or interventions-rating) scheme - the 'food hygiene interventions-rating scheme'. This incorporates a 'food hygiene scoring system' and is based on the assessment of a number of criteria: the potential hazard; the level of (current) compliance with food hygiene rules by the business; and, the confidence in management and in control systems. Those

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1 Local authority monitoring returns to the Food Standards Agency - for 2006/07 (see: [http://www.food.gov.uk/enforcement/ocddata/ocd200607/datasummary](http://www.food.gov.uk/enforcement/ocddata/ocd200607/datasummary)). Additionally, there are approximately 195,000 holdings at primary production level.

2 Copies of the Codes are available at: [http://www.food.gov.uk/enforcement/foodlaw/foodlawcop/](http://www.food.gov.uk/enforcement/foodlaw/foodlawcop/). Please note that the Agency has recently undertaken a review of the Codes, which were last issued in 2006. The revised Code for England is due to be published shortly at the same link. Those for Scotland, Wales and Northern Ireland will follow in due course. Any references to the Codes in relation to the proposed UK-wide SOTD scheme are to the revised Codes (2008 Codes).
businesses that represent a higher risk are subject to more frequent interventions by local authorities than other businesses.

'Scores on the doors'

2.3 SOTD schemes are designed to provide consumers with information about the standards of hygiene at food business premises found by local authority officers when they undertake inspections to check compliance with the legal requirements. The score achieved reflects the inspection findings. The score is made available to the public via web-based systems, and may also be voluntarily displayed (by means of a sticker or certificate) at the business premises. The primary purpose of SOTD is to inform and empower consumers. Experience with current schemes does suggest that this, in turn, can encourage businesses to raise their hygiene standards.

2.4 SOTD schemes assess businesses against compliance with legal requirements on food hygiene. In contrast, hygiene award schemes are designed to recognise businesses that have achieved standards of hygiene over and above that required in order to meet legal requirements.

2.5 It is believed that there are currently 196 SOTD schemes operating/about to be launched in the UK. The design of these schemes varies and includes, three- and five-star approaches, smiley faces, pass/fail, traffic lights systems (see table below). Some provide certificates for voluntary display by businesses at their premises, but many are web-based only. Some are pilot schemes sponsored by the Agency and others have been introduced by local authorities independently of the Agency in response to local needs. Schemes operating elsewhere in Europe include a smiley face scheme in Denmark, and there are also schemes operating in Australia, Canada, Singapore and the United States of America. A summary of data on existing schemes in the UK is shown in the table below.

<table>
<thead>
<tr>
<th>Country</th>
<th>Total local authorities (not including County Councils)</th>
<th>Local authorities with no scheme</th>
<th>5-star schemes*</th>
<th>Non 5-star schemes</th>
<th>Total existing schemes</th>
</tr>
</thead>
<tbody>
<tr>
<td>England</td>
<td>355</td>
<td>172</td>
<td>163</td>
<td>20</td>
<td>183</td>
</tr>
<tr>
<td>Scotland</td>
<td>32</td>
<td>25</td>
<td>0</td>
<td>7</td>
<td>7</td>
</tr>
<tr>
<td>Wales</td>
<td>22</td>
<td>20</td>
<td>2</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>26</td>
<td>22</td>
<td>4</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Total</td>
<td>435</td>
<td>239</td>
<td>169</td>
<td>27</td>
<td>196</td>
</tr>
</tbody>
</table>

* Whilst these schemes all use a 5-star scoring system, the rating scales may differ.

2.6 In 2007, the Food Standards Agency commissioned a formal evaluation of a variety of different SOTD schemes operating in the UK. One part of this exercise evaluated the impact of schemes on local authorities and businesses, and a second part the impact of schemes on consumers. These exercises were completed earlier this year, and the final reports are published on our website.

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3 Complied from information available at April 2008.
2.7. The findings of the evaluation were considered by the Agency's Board at its meeting in March this year.\textsuperscript{5} The Board noted the strong support from consumer, industry and local authority stakeholders for a UK-wide scheme in order to avoid continued proliferation of different arrangements in different areas and to ensure consistency for businesses and clarity for consumers, and concluded that a UK-wide scheme would be desirable. Following a wide-ranging discussion the Board recommended that the Agency should consult on two options for this: a 'three-star, plus fail' (four-tier) scheme and a 'pass/improvement required' scheme based on that which is currently being piloted by local authorities in Scotland.\textsuperscript{6} At its meeting in May 2008 the Board re-visited the SOTD issue following representations by a number of local authorities currently operating schemes based on five-star scoring systems. In recognition of the fact that so many authorities use such systems, it was agreed that, as part of the consultation, stakeholders should be invited specifically to comment on other options for the scoring system that should underpin the UK-wide scheme, based on their experience of these.\textsuperscript{7}

**Models for UK-wide SOTD scheme**

2.8. The two proposals for the UK-wide model are summarised below.

**‘Three-star, plus fail’ (four-tier)**

- Assessment is based on the level of compliance by the business with the European Community Regulations on food hygiene.
- This assessment is linked closely to the ‘food hygiene interventions-rating scheme’ in the *Food Law Codes of Practice* (see Appendix 3 to the consultation letter). This scheme is used to determine the frequency of regulatory activity at food establishments and is based on risk - it incorporates a ‘food hygiene scoring system’.
- The assessment is based around three elements of the ‘food hygiene scoring system’:
  - the level of current compliance based on an assessment the food hygiene and safety procedures in place (e.g. food handling practices, temperature control).
  - the level of current compliance based on the structure of the establishment (e.g. cleanliness, ventilation, lighting).
  - the likelihood of the level of compliance observed being maintained in the future. This is based on the local authority officer's confidence in the management of the business and the control procedures in place, and will be influenced by the track record of the business, the attitude of the management, the technical knowledge available within the business, and satisfactory food safety management systems being in place.
- Taken together, businesses can score from zero to 80, where the lower the score, the better the compliance.
- The initial score may be given only following a 'full inspection' (as described in the *Food Law Codes of Practice*).
- This option differentiates four tiers of compliance. The scale ranges from 'full compliance' at the top, through a 'broadly compliant' tier, an 'improvement required' tier to a 'fail'.
- Where any business does not achieve a 'full compliance' score, the local authority will (in line with the *Food Law Codes of Practice*) communicate in writing to the business, the nature of


\textsuperscript{6} Minutes of the Board meeting, 12 March 2008, Radisson SAS Hotel, Edinburgh (see: http://www.food.gov.uk/multimedia/pdfs/board/boardmins12mar08.pdf).

\textsuperscript{7} The minutes of the May 2008 Board meeting will be available in due course on the Agency's website at: http://www.food.gov.uk/aboutus/ourboard/boardmeetings/
each non-compliance and the necessary remedial action. In this way, every business that does not achieve 'full compliance' will be clear about the steps required to do so.

- The star scoring for each of these tiers and the descriptors for them are shown below.

<table>
<thead>
<tr>
<th>Food hygiene rating system score</th>
<th>Descriptor</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total - 0 to 15</td>
<td><strong>Good</strong> - full standard of compliance with the requirements of the Regulations on food hygiene, with a satisfactory food safety management system.</td>
<td>Three star</td>
</tr>
<tr>
<td>Individual scores - maximum of 5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total - 20 to 30</td>
<td><strong>Satisfactory</strong> - broadly compliant with the requirements of the Regulations on food hygiene but some minor issues requiring improvement.</td>
<td>Two stars</td>
</tr>
<tr>
<td>Individual scores - maximum of 10</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total - 35 to 45</td>
<td><strong>Basic</strong> - improvements are required.</td>
<td>One star</td>
</tr>
<tr>
<td>Total - 50 to 80</td>
<td><strong>Fail</strong> - failure to meet minimum requirements and formal action being taken by the local authority.</td>
<td>No stars</td>
</tr>
</tbody>
</table>

‘Pass/improvement required' (two-tier)

- The assessment is also based on compliance with the European Community Regulations on food hygiene.

- In this case, the scoring system is not wholly dependent on the Food Law Codes of Practice. The general direction and guidance given to local authorities is followed in assessing compliance against the requirements of the Regulations on food hygiene but there is no direct dependency on the 'food hygiene interventions-rating scheme' set out in the Codes. The 'pass/improvement' required option is designed to assess compliance at the time of inspection.

- Assessment is made against all aspects of the Regulations including hygiene practices, the structure of the establishment, equipment and implementation of food safety management systems - i.e. current compliance level.

- The initial score may be given only following a full inspection (as defined in the Food Law Codes of Practice).

- The scheme is designed around the definition of a 'pass' and this represents 'satisfactory compliance' with the Regulations on food hygiene, with any non-compliances being minor in nature only, not recurring and not critical to food safety.

- Any business that does not meet the 'pass' standard falls into the 'improvement required' category - the local authority will (in line with the Food Law Codes of Practice) communicate in writing, the nature of each non-compliance and the necessary remedial action. In this way, every business that does not meet the 'pass' standard will be clear about the steps required to achieve this.

- Minor non-compliances that are not critical to food safety are differentiated from more significant non-compliances. Such minor non-compliances should not affect consumer safety but are legal requirements and notified to the business with the normal expectation that they will be rectified as a matter of course without the need for a re-inspection. However if such minor non-compliances are found to have not been rectified as expected, at a subsequent inspection then the business will not be assessed as a ‘pass’.

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2.9 It is proposed that some features of the UK-wide scheme will be the same irrespective of which scoring system is used. These include:

- Businesses that will be included within the scope of the scheme - all those supplying food directly to consumers (e.g. cafés, bars, restaurants take-aways, supermarkets and other retailers) but not those businesses that have no direct sales (such as manufactures, packers, slaughterhouses etc.);
- Re-scoring mechanism - businesses will be able to request a re-inspection or re-visit where they have taken remedial action for the purposes of re-scoring.
- Appeal mechanism - businesses that are not satisfied with the score that they have been given may appeal through the local authority’s formal complaints procedure; and,
- Display of scores (by means of a certificate or sticker) at business premises - this will be voluntary (though the information will be made available via a web-based platform)

3. OPTIONS

**Option 1**

3.1 Allow continuing organic growth of SOTD schemes (effectively allowing further proliferation of different types of scheme). The Agency would not proceed with establishing a UK-wide SOTD scheme nor provide support of any of the specific schemes that are already operating. Local authorities could continue to operate existing schemes or to introduce new schemes.

3.2 Based on the current rate of introduction of new schemes, the Agency estimates that if Option 1 is pursued, 33 local authorities are likely to launch new SOTD schemes in 2008/2009 in addition to the 196 schemes currently operating. Further, it is estimated that an additional 26 local authorities would introduce new schemes in 2009/2010, 10 in 2010/2011, and none in 2011/2012 (most authorities that choose to run schemes will be doing so by then). By the end of 2011/2012 it is, therefore, estimated that 69 additional local authorities would be running a number of different SOTD schemes (a total of 265 schemes). There are currently at least eight different types of scheme in operation (including three-star, smiley faces, pass/fail etc), although the majority of local authorities have adopted an approach based on five stars.

**Option 2**

3.3 The Agency would establish a UK-wide ‘three-star, plus fail' scheme and actively encourage local authorities to operate this in their areas.

3.4 Compared with the current situation where 196 local authorities are operating/about to launch a variety of SOTD schemes, it is estimated that under Option 2:

- of those local authorities that do not yet have a scheme in place, 23 will implement schemes in 2008/2009 (the number is less than for Option 1 as authorities proposing to launch schemes are likely to delay until the UK-wide scheme is launched in the last quarter of the year), followed by 121 in 2009/2010, 36 in 2010/2011 and none in 2011/2012 - this gives a total of 180 local authorities implementing schemes by the end of 2011/2012, a significant majority of which are expected to be the UK-wide scheme; and
- of those local authorities already operating other schemes, it is estimated that 150 will migrate to the UK-wide scheme by the end of 2011/2012, with a further 46 authorities continuing to operate other existing schemes.
This gives a total of 376 local authorities operating SOTD schemes by the end of this period, a significant majority of which are expected to be the UK-wide scheme.

**Option 3**

3.5 The Agency would establish a UK-wide ‘pass/improvement required’ scheme and actively encourage local authorities to operate this in their areas.

3.6 In terms of take-up, we estimate that the figures would be the same as for the ‘three-star, plus fail’ scheme - a total of 180 new SOTD schemes by the end of 2011/12, a significant majority of which will be the UK-wide scheme, and 150 other authorities already operating schemes migrating to the UK-wide scheme. Again, this gives total estimate of 376 local authorities operating SOTD schemes by the end of this period, a significant majority of which are expected to be the UK-wide scheme.

**Consultation questions**

*Do you agree with the estimates made at paragraph 3.2 of the numbers of authorities that will choose to introduce SOTD schemes if no UK-wide scheme is introduced?*

*Do you agree with the estimates made at paragraphs 3.4 and 3.6 of the numbers of local authorities that are likely to implement and operate the UK-wide SOTD scheme? In particular, do you envisage uptake between Options 2 and 3 to be different? If so, how and why?*

*Do you think there could be difference in uptake in England, Scotland, Wales or Northern Ireland? If so, please explain your answer.*

4. **CONSULTATION**

4.1 The evaluation exercise which the Agency undertook on existing SOTD schemes (see para 2.6) was based around the views of consumer, industry and enforcement stakeholders. This followed an initial project by Greenstreet Berman in 2006 which included a series of consumer and industry focus groups around the UK. The subsequent more detailed evaluation by Continental Research included street surveys, focus groups, hall tests, and exit interviews.

4.2 Additional consultation with consumers and industry has also taken place. This included the setting up of a UK Independent Advisory Group, discussion by the Agency's Consumer Stakeholder Forum, and engagement directly with consumers at a Citizens' Forum in January 2007.

4.3 Local authorities were invited to a series of workshops across the UK in the summer of 2007. In total, 100 delegates attended, representing 94 authorities. The feedback from these sessions was taken into account in the Greenstreet Berman research (see above). The evaluation also took into account feedback from businesses through responses to questionnaires (over 700 received), and over four hundred subsequent telephone interviews. Business and enforcement groups were also involved in the Independent Advisory Group.

4.4 In February 2008, a workshop was held in London to allow stakeholder groups to present their views direct to the Agency’s Board in advance of the subject being discussed in formal session.

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4.5 A full 12-week public consultation is being undertaken on the proposals for introducing a UK-wide SOTD scheme and on this Impact Assessment (IA). During this time, the Agency also proposes to engage with stakeholders on a less formal basis. This will include discussion with the Agency’s Enforcement Liaison Group\textsuperscript{12} and the Consumer Stakeholders Forum,\textsuperscript{13} as well as participation in meetings etc. with consumers, local authorities and industry.

5. **COSTS AND BENEFITS**

**Groups affected**

**Consumers**

5.1 The primary purpose of SOTD schemes is to provide information to consumers on the standards of hygiene in food businesses, empowering them to make more informed choices about the places in which they purchase food. The introduction of a UK-wide scheme aims to make it easier for them to make comparisons between businesses in different areas.

**Food businesses**

5.2 The food businesses that will potentially be affected will depend on the scope of the UK-wide scheme - whether it is extended to all food businesses, whether it covers all those which supply consumers directly, or whether it is restricted only to the catering sector (restaurants, cafes, bars, takeaways etc.). For the purposes of this assessment, the assumption is made that the scheme will cover all those businesses supplying food direct to consumers. The number of UK establishments in this group is estimated at 545,000 (Local Authority Survey Data 2006/2007).\textsuperscript{14} The issue of scope is being addressed as part of the consultation exercise (see Appendix 1 to the consultation letter) and this section and the data on number of businesses used elsewhere in the IA will be updated to take account of the results of the consultation.

**Local authorities**

5.3 In the UK, local authorities are responsible for monitoring compliance of food businesses with food hygiene legislation and are, therefore, responsible for the inspections that form the basis of the SOTD assessment of a food business. A total of 435 authorities are involved and could implement and operate the UK-wide SOTD scheme.

5.4 The success of the UK-wide scheme will depend on ‘buy-in’ from local authorities and their adoption of the recommended approach. The majority of authorities have not yet adopted a scheme locally. For those that have, there could be particular difficulties where the scheme being used does not have the same basic design as the UK-wide scheme. A comprehensive support package is being developed by the Agency to assist both local authorities that have not previously had a scheme in place and those that choose to migrate to the UK-wide scheme.

\textsuperscript{12} The Enforcement Liaison Group is a stakeholder group which was established to strengthen and develop links between the FSA and local authority food law enforcement services. As well as representatives from enforcement authorities, membership comprises representatives from consumer, professional and industry bodies. The Group provides a forum for discussion of strategic food law enforcement issues.

\textsuperscript{13} This Food Standards Agency Group was set up to provide an opportunity for stakeholders to ask questions about the Agency and discuss topical and emerging issues, with Agency representatives, and to look ahead and keep up to date with the FSA and stakeholder plans for the next six months.

\textsuperscript{14} Local authority monitoring returns to the Food Standards Agency - for 2006/07 (see: \url{http://www.food.gov.uk/enforcement/ocddata/ocd200607/datasummary}).
5.5 Some assumptions relating to local authorities have been made in this IA:

- that there are no structural differences between authorities, i.e. no population differences, no cost differences etc., and
- that ‘buy-in’ by local authorities follows the expected growth as described in each option below.

Costs

Option 1

5.6 The estimated costs for option 1 are set out in the table below and then described in more detail.

<table>
<thead>
<tr>
<th></th>
<th>2008/9</th>
<th>2009/10</th>
<th>2010/11</th>
<th>2011/12</th>
<th>Total 2008/12</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>One-off costs (£)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LAs (initial training)</td>
<td>41,405</td>
<td>33,641</td>
<td>12,939</td>
<td>0</td>
<td>87,985</td>
</tr>
<tr>
<td>Businesses (familiarisation)</td>
<td>647,886</td>
<td>526,407</td>
<td>202,464</td>
<td>0</td>
<td>1,376,758</td>
</tr>
<tr>
<td><strong>On-going costs (£)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LAs (on-going training)</td>
<td>0</td>
<td>4,140</td>
<td>7,505</td>
<td>8,798</td>
<td>20,444</td>
</tr>
<tr>
<td>LAs (complaints)</td>
<td>28,690</td>
<td>52,000</td>
<td>60,966</td>
<td>60,966</td>
<td>202,622</td>
</tr>
<tr>
<td>LAs (printing/issuing of cert)</td>
<td>0 - 96,000</td>
<td>0 - 174,000</td>
<td>0 - 204,000</td>
<td>0 - 204,000</td>
<td>0 - 678,000</td>
</tr>
<tr>
<td>FSA (publicity)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total costs (£)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1,641,255 -</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2,279,804</td>
</tr>
</tbody>
</table>

* The present value tells us the value today of an amount of money in the future through discounting to reflect the time value of money and other factors such as investment risk.

Local authorities

5.7 Under Option 1, it is estimated that an additional 69 local authorities will launch their own SOTD scheme by the end of 2011/12 (see para 3.2). The associated costs for Option 1 include, training, the printing/issuing of certificates and dealing with complaints. The assumptions for these are set out below.

5.8 For each local authority launching a new scheme during this time, there would be set-up and other costs as follows:

- Initial training of Environmental Health Officers (EHOs) carrying out SOTD assessments. It is estimated that the training would take a full day at a direct cost of £250 per EHO. In addition, the opportunity cost of the time spent by EHOs on training is estimated to be £125 per trained individual, based on an hourly rate (including 30% overheads) of £17.89 per hour. Finally, it is estimated that there are 1,500 EHOs employed by local authorities who work in food hygiene.

- Ongoing training of EHOs. This is quantified based on the assumption that, following the launch of the scheme, 10% of EHOs would need to be trained (or retrained) annually.

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15 ONS ASHE Survey 2007, uprated by 30% to account for overheads
16 Single integrated national control plan for the United Kingdom (January 2007 to March 2011), Revision 2 - issued February 2008 - see Appendix E. Available at: [http://www.food.gov.uk/foodindustry/regulation/europeleg/feedandfood/ncpuk](http://www.food.gov.uk/foodindustry/regulation/europeleg/feedandfood/ncpuk)
• Printing and issuing of certificates. Both Greenstreet Berman’s evaluation of SOTD pilots and discussions with local authorities suggest that such costs typically vary widely and some do not currently issue certificates. Therefore an assumption of an incremental cost range between £0 and £3,000 per authority per annum has been used.

• Handling complaints of businesses unhappy with their scores. It is assumed that 2% of all food businesses would make formal complaints to their local authority, and that it would take an average of two hours of EHO time to address each complaint.\(^\text{17}\)

• Re-visits of businesses dissatisfied with their scores. Whether local authorities launching SOTD under Option 1 would include re-scoring mechanisms is not known so this cost is not included in the calculations.

• Legal challenges. At this stage the potential costs of any legal challenge for local authorities is unclear so they have been excluded from the calculations in this IA. Costs should become clearer as and when cases are brought.

5.9 Altogether, the present value of the cost to local authorities above the current situation is estimated to be between £296k and £934k.

Costs to businesses

5.10 The managers of food businesses in the local authorities launching SOTD from 2008/9 to 2011/12 would need to familiarise themselves with the scheme being adopted. It is estimated that it would take them an hour to do so, and that the hourly rate of a manager of a food business is £16.16 (adjusted to include 30% overheads).\(^\text{18}\) If it is assumed that food businesses are uniformly distributed across local authorities, there would be an estimated 85,195 businesses in new SOTD schemes under Option 1, and the present value of the one-off cost imposed on those businesses from 2008/9 to 2011/12 is approximately £1,345k.

5.11 Apart from this one-off cost, it is thought that other costs to businesses would be minimal. This is in line with the results of the Greenstreet Berman evaluation of SOTD pilots, which indicates that the investments made by food businesses following the launch of SOTD are typically voluntary, reflecting a commercial decision to achieve higher scores. SOTD would not impose additional time cost on businesses either as the scores would be determined during regular inspection/intervention visits by local authority officers. Altogether, it is considered that apart from the one-off time cost of familiarisation calculated above, SOTD schemes do not impose any incremental costs on food businesses.

Total costs

5.12 The present value tells us the value today of an amount of money in the future through discounting to reflect the time value of money and other factors such as investment risk. Once the costs above are discounted at a rate of 3.5%\(^\text{19}\) they give the present value cost of approximately £1,641k - £2,280k.

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\(^{17}\) Based on anecdotal evidence.

\(^{18}\) Estimate drawn from the 2007 ONS Annual Survey of Hours and Earning for "Managers and Proprietors in Services",

\(^{19}\) As set out in the Treasury’s Greenbook: [http://greenbook.treasury.gov.uk/](http://greenbook.treasury.gov.uk/)
Consultation questions

We welcome views from stakeholders regarding the above costs/assumptions and on any omissions/further information that stakeholders can identify to help us assess the impact of this option on local authorities and on businesses.

In particular, do you agree that SOTD schemes do not impose any further incremental costs on food businesses? If not, please provide details of other costs.

Options 2 and 3

5.13 We believe that both Option 2 and Option 3 will give rise to the same costs, and so both options are dealt with together in the following section. If the consultation responses suggest that the costs might differ between the Options then we will separate them out when finalising the IA.

5.14 The costs for Options 2 and 3 are set out in the table below and then described in further detail.

<table>
<thead>
<tr>
<th></th>
<th>2008/9</th>
<th>2009/10</th>
<th>2010/11</th>
<th>2011/12</th>
<th>Total 2008/12</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current value</td>
<td>Present value</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>One-off costs (£)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FSA (initial training)</td>
<td>29,760</td>
<td>156,561</td>
<td>46,580</td>
<td>0</td>
<td>232,901</td>
</tr>
<tr>
<td>Businesses (familiarisation)</td>
<td>465,668</td>
<td>2,449,819</td>
<td>728,872</td>
<td>0</td>
<td>3,644,359</td>
</tr>
<tr>
<td></td>
<td>232,901</td>
<td>224,510</td>
<td>3,513,052</td>
<td></td>
<td></td>
</tr>
<tr>
<td>On-going costs (£)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LAs (on-going training)</td>
<td>0</td>
<td>2,976</td>
<td>18,632</td>
<td>23,290</td>
<td>44,898</td>
</tr>
<tr>
<td>LAs (complaints)</td>
<td>20,621</td>
<td>129,104</td>
<td>161,380</td>
<td>161,380</td>
<td>472,485</td>
</tr>
<tr>
<td>LAs (printing/issuing of cert)</td>
<td>0 - 69,000</td>
<td>0 - 432,000</td>
<td>0 - 540,000</td>
<td>0 - 540,000</td>
<td>0 - 1,581,000</td>
</tr>
<tr>
<td>FSA (publicity)</td>
<td>0</td>
<td>300,000</td>
<td>300,000</td>
<td>300,000</td>
<td>900,000</td>
</tr>
<tr>
<td>Total costs (£)</td>
<td>5,060,893</td>
<td>-</td>
<td>6,538,429</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

5.15 It is estimated that 180 additional local authorities would launch SOTD schemes by the end of 2011/12 under both Options, and the costs in the table above relate to these. The assumptions listed above for Option 1 remain the same for Option 2 and Option 3 unless otherwise stated.

Local authorities

5.16 IT costs - By supporting a UK-wide scheme, the Agency will greatly reduce those costs for local authorities. They are not included in the assessment at this stage, however, because we are currently considering the options for IT to support the UK-wide scheme but we will provide cost estimates for the final IA.

5.17 It is hoped that local authorities already running SOTD schemes will switch to the UK-wide scheme but it is envisaged that the transition would only happen slowly over a period of time. The resulting costs beyond what such authorities would normally spend on SOTD are believed to be minimal and are not considered in this assessment.

5.18 Local authorities would have the costs of dealing with complaints, on-going training, and the printing and issuing of certificates. The assumptions made in respect of these costs are identical to Option 1.
5.19 Altogether, the present value of the cost to local authorities above the current situation is estimated to be between £483k and £1,960k.

Food businesses

5.20 The managers of food businesses in the local authorities launching the UK-wide scheme from 2008/9 to 2011/12 would need to familiarise themselves with the scheme. It is estimated that it would take them an hour to do so, and that the hourly rate of a manager of a food business is £16.16 (adjusted to include 30% overheads).20 If it is assumed that food businesses are uniformly distributed across local authorities, there would be an estimated 225,517 businesses within the UK-wide scheme under Option 2 or Option 3, and the present value of the one-off cost imposed on those businesses from 2008/9 to 2011/12 is £3,513k.

5.21 As in Option 1 (see para 5.11), and in line with the results of the Greenstreet Berman evaluation, it is thought that all other costs to businesses would be minimal due to the voluntary nature of the scheme.

Food Standards Agency

5.22 Under these options the FSA would provide the initial training as part of its support package for local authorities. As in Option 1 it is assumed that there are 1,500 EHOs. The costs of training will be spread over time because local authorities will join at different times. The present value for the FSA of the initial training is estimated to be £225k.

5.23 The evaluation of SOTD pilots by Greenstreet Berman established that consumer awareness of existing schemes remains low. Although adoption of a UK-wide scheme would help raise awareness by generating some press coverage and making it easier for consumers to understand SOTD, the need would remain for some direct publicity. The Agency has budgeted £900,000 for the design and launch of the scheme, for ‘core’ materials (e.g. stickers, key leaflets etc.), and for the development of IT solutions. £300,000 would be made available each year for the first three years. This gives a present value of the incremental cost of about £840k.

5.24 Altogether, the present value of the cost to the FSA above the current situation is estimated to be £1,065k.

Total costs

5.25 Once the costs above are discounted at a rate of 3.5%21 they give the present value cost of £5,061k to £6,538k.

Consultation questions

Do you agree with the above costs/assumptions? Can you identify any omissions/further information to help us assess the impact of either Option 2 or Option 3 on local authorities and on businesses?

Do you foresee any other costs for the Agency? If so, can you please explain these?

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20 Estimate drawn from the 2007 ONS Annual Survey of Hours and Earning for "Managers and Proprietors in Services".  
21 As set out in the Treasury’s Greenbook at: http://greenbook.treasury.gov.uk/
Benefits

Option 1

5.26 The benefits for Option 1 are set out in the table below and then described in further detail.

<table>
<thead>
<tr>
<th>Benefits (£)</th>
<th>2008/9</th>
<th>2009/10</th>
<th>2010/11</th>
<th>2011/12</th>
<th>Total 2008/12</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAs (reduced inspections)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LAs (reduced FoI requests)</td>
<td>1,431</td>
<td>2,594</td>
<td>3,041</td>
<td>3,041</td>
<td>10,108</td>
</tr>
<tr>
<td>Businesses (reduced inspections)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Consumers (public health)</td>
<td>0</td>
<td>1,235,835</td>
<td>2,239,950</td>
<td>2,626,148</td>
<td>6,101,933</td>
</tr>
<tr>
<td><strong>Total benefit (£)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5,663,215</td>
</tr>
<tr>
<td><strong>Net benefit (£)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3,383,412 - 4,021,960</td>
</tr>
</tbody>
</table>

Consumers

5.27 A further uptake of SOTD schemes by local authorities may help consumers to assess the food safety risks involved in the purchase of food and, consequently, improve consumer choice. Further proliferation of different types of schemes could, however, cause confusion to consumers and reduce the potential benefits of providing this information. Thus, it is thought that the movement of businesses away from a number of current schemes onto the agency scheme could bring further health benefits to consumers. Due to the difficulty in assessing the incremental benefit of switching to the Agency scheme no monetary benefit is assigned to such activity in this Impact Assessment.

5.28 It is extremely difficult to place a monetary value on the related benefit of an increase in uptake of SOTDs by local authorities. The quantification of benefits therefore proceeds more indirectly, by estimating the potential reduction in the economic cost of food-borne diseases in the UK economy that could follow from the roll-out of SOTD to additional local authorities.

5.29 The Health Protection Agency (HPA) estimates that 950,000 indigenous cases of food poisoning occurred in 2006 in England & Wales, which caused 452 deaths. The related economic cost of £1.5 billion is derived in an Agency Board Paper, available at [http://www.food.gov.uk/multimedia/pdfs/board/fsa080207.pdf](http://www.food.gov.uk/multimedia/pdfs/board/fsa080207.pdf).

5.30 This cost figure is easily scaled up to give a UK estimate of the cost of food-borne diseases of £1.7 billion. Cost savings from the implementation of further SOTD schemes can then be calculated as a function of the effectiveness of SOTD in reducing the burden of food-borne diseases, and the number of implementing local authorities. Although it is very difficult to anticipate the reduction in the incidence of food-borne diseases that the introduction of a UK-wide SOTD scheme might bring about, evaluations of SOTD schemes in other countries can help establish an order of magnitude for that reduction:

- In Los Angeles County, the introduction of “grade cards” in January 1998 was followed by an estimated 13.1% decrease in the number of food-borne-disease hospitalisations. This decrease was sustained in subsequent years. The result is particularly interesting because the analysis controlled for the main factors influencing FBD incidence, so that the decrease should only reflect the effect of SOTD.  

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• In Toronto, the Food Premises Inspection and Disclosure Program was associated with a significant decrease in the incidence of key food-borne diseases that can be attributed to retail food premises.²³

• The evaluation of an SOTD scheme in Pasco County in the USA also found a reduction in food-borne illness following the launch of the scheme.²⁴

5.31 Based on this limited evidence, the assumption is made of a one percent decrease in disease burden in the local authorities introducing SOTD, which seems conservative in view of the Los Angeles results cited above. It is further assumed that the reduction in cases of food poisoning only happens after a one-year lag, and that the disease burden is uniformly distributed across Local authorities. For Option 1 the net present value of the estimated public health benefit over the 2008/9 to 2010/11 period is £5,654k.

Local authorities

5.32 The Greenstreet Berman evaluation of SOTD pilots in the UK concludes that SOTD schemes encourage food businesses to improve hygiene standards, based on the subjective opinions of business managers, the analysis of changes in hygiene inspection scores following the introduction of SOTD, and various research reports on SOTD schemes in the UK and elsewhere. Given that the frequency of inspection visits in the UK is risk-based, it is therefore possible that the launch of SOTD in additional local authorities under Option 1 would result in a decrease in the total number of inspection visits of food premises, and their partial replacement with alternative interventions (e.g. training and coaching visits). Unfortunately, the evidence available to date does not allow for a quantitative assessment of this change, and the related benefit therefore remains non-monetised. It is estimated, however, that each replacement of an inspection visit with an alternative intervention saves in the region of £67 to local authorities (i.e. a saving of three hours and 45 minutes of EHO time, valued at the £17.89 per hour wage rate already mentioned).

5.33 An additional benefit from a SOTD campaign is believed to be a likely reduction in the time taken to answer Freedom of Information (FOI) requests that local authorities currently receive in relation to their assessment of hygiene standards in food premises. It is assumed that SOTD will reduce the time taken to answer a request by 15 minutes. The Agency estimates that local authorities without SOTD receive an average of 10 FOI requests annually, each of which requires an average of three hours of EHO time to handle. The related FOI savings under Option 1 are estimated to be worth £10k over the current situation.

Businesses

5.34 Businesses may also benefit from a reduction in the number of inspections that SOTD should deliver but, as mentioned in 5.31 with reference to local authorities, it not possible to quantify that reduction. The benefit therefore remains non-monetised.

Total benefits

5.35 Once the benefits above are discounted at a rate of 3.5%²⁵ they give the present value benefit of £5,663k and a net present value estimate of between £3,383k and £4,022k.

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²⁴ Boehnke R.H and Graham C. International survey on public posting of relevant inspection reports and/or grade cards posting schemes based upon health inspections. www.foodsafetynetwork.ca

²⁵ As set out in the Treasury’s Greenbook (see: http://greenbook.treasury.gov.uk/).
Option 2 and 3

5.36 We believe that both Option 2 and Option 3 will have the same benefits, and so both Options are dealt with together in the following section. If the consultation responses suggest that the benefits might differ between the options then we will separate them out when finalising the IA.

5.37 All assumptions used in Option 1 remain the same for Options 2 and 3 unless otherwise stated.

5.38 The benefits for Option 2 and Option 3 are set out in the table below and then described in further detail.

<table>
<thead>
<tr>
<th>Benefits (£)</th>
<th>2008/9</th>
<th>2009/10</th>
<th>2010/11</th>
<th>2011/12</th>
<th>Total 2008/12</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Current value</td>
<td>Present value</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LAs (reduced inspections)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>LAs (reduced FoI requests)</td>
<td>1,029</td>
<td>6,440</td>
<td>8,051</td>
<td>8,051</td>
<td>23,570</td>
</tr>
<tr>
<td>Businesses (reduced inspections)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Consumers (Public Health)</td>
<td>0</td>
<td>888,256</td>
<td>5,561,255</td>
<td>6,951,569</td>
<td>13,401,081</td>
</tr>
<tr>
<td>Total benefit (£)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>12,341,654</td>
</tr>
<tr>
<td>Net benefit (£)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5,803,225-7,280,761</td>
</tr>
</tbody>
</table>

Consumers

5.39 The net present value of the estimated public health benefit over the 2008/9 to 2010/11 period is £12,320k for these Options.

Local authorities

5.40 The related savings for local authorities under options 2 and 3 which are due to the reduction in time it will take to answer FoI requests are estimated to be worth £22k over the 2008/9 to 2010/11 period.

Businesses

5.41 Businesses could also benefit from a reduction in the number of inspections that SOTD should deliver but, as mentioned above with reference to local authorities, it not possible to quantify that reduction. The benefit therefore remains non-monetised.

5.42 SOTD may provide an incentive to businesses to comply with the legal requirements. Businesses achieving high scores could find that they are rewarded monetarily through increased revenue. For example, in Los Angeles County, before grade cards were introduced, changes in restaurant hygiene quality had no impact on restaurant revenue, but after their implementation, if a restaurant received an A grade, their revenue increased by 5.7% relative to their revenue when there were no grade cards. B grade restaurants saw a revenue increase of 0.7%, however, C grade restaurants saw a decrease of 1%. SOTD may also lead to increased confidence in the food sector as a whole, leading to a higher incidence of purchases and increased revenue.
Total benefits

5.43 Once the benefits above are discounted at a rate of 3.5%\textsuperscript{26} they give the present value benefit of £12,342k and a net present value estimate of between £5,803k and £7,281k.

Consultation questions

Do you agree with the information and assumptions used in the benefits sections above? If not, would you please explain your reasons and, where possible, provide evidence to support your explanation.

6. SENSITIVITY ANALYSIS\textsuperscript{27}

6.1 The assumption of a one percent in disease burden in local authorities taking up SOTD, though conservative in view of the evidence reported in the academic literature, remains somewhat arbitrary. As the assumption drives the quantification of the benefits, a sensitivity analysis is carried out to determine the minimum reduction in disease burden that ensure that the benefits of SOTD outweigh their costs. In the case of the UK-wide scheme (Options 2 or 3), the upper bound for the break-even point is 0.53%, i.e. it is only necessary to assume that the introduction of SOTD leads to a 0.53% decrease in cases of food-borne diseases for the policy option to be cost beneficial. This assessment therefore strongly supports the view that SOTD policies are, overall, cost beneficial.

7. REVIEW

7.1 The results of the consultation exercise will be fed back to the Food Standards Agency Board in open session in the Autumn of 2008. The Board will then make a recommendation about which of the two proposed options should be taken forward as the recommended UK-wide approach.

7.2 The Agency will commission an evaluation of the effectiveness and success of the UK-wide scheme. This evaluation will be carried out over a two-year period from the launch of the UK-wide scheme.

8. ADMINISTRATIVE BURDENS

8.1 The cost-benefit analysis in Section 5 explained that the only costs imposed by SOTD on businesses relate to the time taken by managers of food businesses to familiarise themselves with the scheme. However, in line with the UK Standard Cost Model\textsuperscript{28} supporting the calculation of administrative burdens, one-off costs are not included in the measurement of administrative burden baselines. It follows that none of the policy options creates any additional administrative burden, as reported on the “Summary: Analysis & Evidence” pages.

\textsuperscript{26} As set out in the Treasury's Greenbook (see: http://greenbook.treasury.gov.uk/).

\textsuperscript{27} Sensitivity analysis involves changing one variable or assumption at a time to see the extent to which different changes in the assumptions may alter the results.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

<table>
<thead>
<tr>
<th>Type of testing undertaken</th>
<th>Results in Evidence Base?</th>
<th>Results annexed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Competition Assessment</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Small Firms Impact Test</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Legal Aid</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Sustainable Development</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Carbon Assessment</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Other Environment</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Health Impact Assessment</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Race Equality</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Disability Equality</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Gender Equality</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Human Rights</td>
<td>No</td>
<td>-</td>
</tr>
<tr>
<td>Rural Proofing</td>
<td>No</td>
<td>-</td>
</tr>
</tbody>
</table>
EU Annex

[Use this space to set out BRIEFLY the background and current EU position. Click once on the grey area below and type. Format using EB styles from the toolbar above.]
Competition Assessment
The guidance of the Office of Fair Trading on competition assessments sets out four questions to establish the impact of a proposal on competition:

- **Would the proposal directly limit the number or range of suppliers?** The answer is negative in relation to SOTD schemes.
- **Would the proposal indirectly limit the number or range of suppliers?** This would occur primarily if the proposal raised the costs of a particular sub-group of firms in the food sector (e.g., small/large firms, new/existing firms, take-aways etc.). However, as identified in the cost-benefit analysis section, the costs imposed by SOTD on businesses are thought to be minimal. However, indirect effects could become visible in rural areas if a number of businesses close, potentially creating market power issues. However, lower search costs for consumers could lead to more intense competition among restaurants. The scores could make consumers more confident about trying restaurants they have not experienced before and therefore allow new entrants to effectively compete in the market.
- **Would the proposal limit the ability of suppliers to compete?** The key consideration here is whether the proposal would impose “minimum quality standards”. This is not the case because the minimum hygiene standards imposed by law on food businesses are not affected by SOTD.
- **Would the proposal reduce suppliers’ incentive to compete vigorously?** If anything, SOTD add another dimension (food safety) to the competition process and reduce the costs to customers of switching between suppliers (because customers no longer need to rely on their own experience to assess hygiene standards).

Altogether, the influence of SOTD schemes on competition is, therefore, thought to be limited but positive. In essence, SOTD would remove a distortion created by imperfect food safety information, thereby reinforcing the fairness and intensity of competition among food businesses.

Small Firms Impact Test
The only business costs identified in Section 5 would result from the need for business managers to familiarise themselves with SOTD. Although this cost is a “one-off” and therefore proportionally larger for small businesses, it is too small (£16 per business) to have a significant effect on the performance of those businesses.

Sustainable development
The Agency believes that the introduction of a UK-wide SOTD scheme will have no impact on environmental sustainability issues.

Race equality issues
The Agency believes that the introduction of a UK-wide SOTD scheme will have no impact on racial equality issues.

Gender equality issues
The Agency believes that the introduction of a UK-wide SOTD scheme will have no impact on gender equality issues.

Disability equality issues
The Agency believes that the introduction of a UK-wide SOTD scheme will have no impact on disability equality issues.

**Consultation questions**
*Do you agree with the assessments that we have made in this section? If not, please explain your answer.*
Note
The Food Law Codes of Practice currently in place were issued in 2006. The Agency has recently undertaken a review of these. A revised Code for England is due to be published very shortly and the text below is reproduced from this. Revised Codes in Scotland, Wales and Northern Ireland are also due to be published in 2008.

Basic principles

i. Food Authorities that are responsible for enforcing food hygiene law should determine the food hygiene intervention frequencies of food establishments within their area using the risk assessment criteria in this Annex, in order to determine their planned food hygiene intervention programmes.

ii. All establishments subject to approval under Regulation 853/2004 are to be included in this determination.

iii. The scheme incorporates an option for alternative enforcement strategies other than primary inspections for “low-risk” establishments, in which the inherent hazards are not significant by virtue of their trading activities or the number of consumers they supply (see below).

iv. The scheme is set out in the form of an assessment document that can be used by officers in the field. An assessment should be completed at the end of the initial inspection of each new establishment and after each full inspection. An assessment should also be completed following a partial inspection or audit where sufficient evidence has been gathered to complete an assessment.

v. Officers should use the full range of scores available within the system, as the purpose of the rating system will be frustrated by cautious marking or by a reluctance to recognise effective management/control systems.

vi. Establishments that fall into more than one scoring category for a scoring factor should be allocated the highest score of those that are applicable.

vii. The operation of this intervention rating scheme within the Food Authority should be subject to periodic management review to ensure that staff are using the scheme correctly and consistently.

viii. The Food Authority’s programme of planned interventions for higher risk businesses must always take preference over that for lower risk businesses. The practice of completing the intervention programme at lower risk businesses which have not been visited during an earlier programme before commencing the intervention at higher risk businesses cannot be supported.

ix. Planned interventions should normally be completed by the due date as determined by the intervention rating, but in any case no more than 28 days after that date, apart from circumstances outside the control of the Food Authority such as seasonal business closures.

Low-risk activities (category E establishments)

i. “Low-risk” establishments must be subject to an alternative enforcement strategy or intervention, at least once during any three year period.
ii. Food Authorities that decide to subject “low-risk” establishments to alternative enforcement strategies must set out their strategies for maintaining surveillance of such establishments in their Food Service Plan or Enforcement Policy.

It is not intended to preclude inspection, partial inspection or audit at such establishments where any of these are the Food Authority’s preferred surveillance option, in which case the minimum frequency of intervention is determined by the intervention rating.

**Food hygiene scoring system**

**Part 1: The potential hazard**

Three factors determine the potential hazard:

**A. Type of food and method of handling**

<table>
<thead>
<tr>
<th>Score</th>
<th>Guidance on the scoring system</th>
</tr>
</thead>
<tbody>
<tr>
<td>40</td>
<td>Manufacturers of high-risk food (including those subject to approval under Regulation 853/2004), wholesalers, and packers who re-wrap or re-pack high-risk foods. In this context, high-risk foods may be regarded as foods which support the growth of micro-organisms, and/or are intended for consumption without further treatment that could destroy pathogenic micro-organisms or their toxins.</td>
</tr>
<tr>
<td>30</td>
<td>Preparation, cooking or handling of open high-risk foods by caterers and retailers, except caterers that prepare less than 20 meals a day (see below).</td>
</tr>
<tr>
<td>10</td>
<td>Handling of pre-packed high-risk foods; Caterers who prepare high-risk foods but serve less than 20 meals a day; Other wholesalers and distributors not included in the categories above; Manufacture or packing of foods other than high-risk; Establishments involved in the filleting, salting or cold smoking of fish for retail sale to final consumer.</td>
</tr>
<tr>
<td>5</td>
<td>Retail handling of foods other than high-risk, such as fruit, vegetables, canned and other ambient shelf stable products. Any other businesses not included in the categories above.</td>
</tr>
</tbody>
</table>

**B. Method of processing**

An additional score should be included for processes listed in the table below. If an additional score under this section is appropriate, it may only be allocated once, i.e. the maximum score under this section is 20.
Score | Guidance on the scoring system
--- | ---
20 | Thermal processing or aseptic packing of low-acid foods; Vacuum and sous-vide packing (except raw/unprocessed meat and dried foods); Manufacture of cook/chill food, i.e. cooked and prepared meals or foods which may be eaten cold or after reheating. (NB: Catering premises should not be included in this category unless they are engaged in the specific operation referred to commercially, as the preparation of cook-chill meals. The simple reheating of cook-chill meals is excluded from the scope of this paragraph); Small-scale production of cooked meat products in food business establishments which are not subject to approval under Regulation 853/2004 e.g. by certain retailers including butchers.

0 | Any other case not included above.

Score:

C. Consumers at risk

The number of consumers likely to be at risk if there is a failure of food hygiene and safety procedures.

Score | Guidance on the scoring system
--- | ---
15 | Manufacturers of food which is distributed nationally or internationally.

10 | Businesses serving a substantial number of customers, including a significant proportion from outside the local area, e.g. superstore, hypermarket, airport caterer, motorway service area caterer; Manufacturers not included in the category above.

5 | Businesses, most of whose customers are likely to be living, staying or working in the local area, e.g. high street or corner shop, high street supermarket, or high street restaurant.

0 | Businesses supplying less than 20 consumers each day.

Score:

PLUS

An additional score of 22 (in addition to the score above) should be included for establishments such as hospitals, nursing homes, day-care centres and child nurseries, where production and/or service of high-risk foods takes place, and where more than 20 persons in a vulnerable group are at risk. In this context, vulnerable groups are those that include people who are under five or over 65 years of age, people who are sick, and people who are immunocompromised.
Score: [ ]

Part 2: Level of (current) compliance

The food hygiene and safety procedures (including food handling practices and procedures, and temperature control), and the structure of the establishment (including cleanliness, layout, condition of structure, lighting, ventilation, facilities etc.), should be assessed separately using the scoring system below.

The score should reflect compliance observed during the inspection according to the guidance set out below. Adherence to any relevant UK or EU Industry Guide to Good Hygiene Practice should be considered when assessing compliance.

Conformity with relevant national guidelines or industry codes of recommended practice will also be necessary to score 0 or 5.

<table>
<thead>
<tr>
<th>Score</th>
<th>Guidance on the scoring system</th>
</tr>
</thead>
<tbody>
<tr>
<td>25</td>
<td>Almost total non-compliance with statutory obligations.</td>
</tr>
<tr>
<td>20</td>
<td>General failure to satisfy statutory obligations – standards generally low.</td>
</tr>
<tr>
<td>15</td>
<td>Some major non-compliance with statutory obligations – more effort required to prevent fall in standards.</td>
</tr>
<tr>
<td>10</td>
<td>Some non-compliance with statutory obligations and industry codes of recommended practice. Standards are being maintained or improved.</td>
</tr>
<tr>
<td>5</td>
<td>High standard of compliance with statutory obligations, industry codes of recommended practice, and minor contraventions of food hygiene regulations. Some minor non-compliance with statutory obligations and industry codes of recommended practice.</td>
</tr>
<tr>
<td>0</td>
<td>High standard of compliance with statutory obligations and industry codes of recommended practice; conforms to accepted good practices in the trade.</td>
</tr>
</tbody>
</table>

Score – hygiene: [ ]

Score – structural: [ ]

Part 3: Confidence in management/control procedures

The actual performance of management is scored in Part 2 on the basis of the results achieved and observed. A management that achieves good food hygiene performance, well understood by the workforce, should have achieved a good standard in Part 2, and consequently a low score for that factor.
Confidence in management is not meant to reconsider this aspect. It is to elicit a judgement on the likelihood of satisfactory compliance being maintained in the future.

Factors that will influence the inspector’s judgement include:

- the “track record” of the company, its willingness to act on previous advice and enforcement, and the complaint history;
- the attitude of the present management towards hygiene and food safety; and
- hygiene and food safety technical knowledge available to the company (internal or external), including hazard analysis/HACCP and the control of critical points;
- satisfactory HACCP based procedures.

### Guidance on the scoring system

<table>
<thead>
<tr>
<th>Score</th>
<th>Guidance on the scoring system</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>Poor track record of compliance. Little or no technical knowledge. Little or no appreciation of hazards or quality control. No food safety management procedures.</td>
</tr>
<tr>
<td>20</td>
<td>Varying record of compliance. Poor appreciation of hazards and control measures. No food safety management system.</td>
</tr>
<tr>
<td>10</td>
<td>Satisfactory record of compliance. Access to and use of technical advice either in-house, from trade associations and/or from Guides to Good Practice. Understanding of significant hazards and control measures in place. Making satisfactory progress towards a documented food safety management system/procedures commensurate with type of business.</td>
</tr>
<tr>
<td>5</td>
<td>Reasonable record of compliance. Technical advice available in-house or access to, and use of, technical advice from trade associations and/or from Guides to Good Practice. Have satisfactory documented procedures. Able to demonstrate effective control of hazards. Will have satisfactory documented food safety management system. Audit by Food Authority confirms general compliance with procedures.</td>
</tr>
<tr>
<td>0</td>
<td>Good record of compliance. Access to technical advice within organisation. Will have satisfactory documented HACCP based food safety management procedures, which may be subject to external audit process. Audit by Food Authority confirms compliance with documented procedures with few/minor non-conformities not identified in the system as critical control points.</td>
</tr>
</tbody>
</table>

### PLUS

An additional score of 20 (in addition to the score above) should be included where there is a significant risk:

- of food being contaminated with *Clostridium botulinum* and the micro-organism surviving any processing and multiplying; or
- of ready-to-eat food being or becoming contaminated with micro-organisms or their toxins that are pathogenic to humans, e.g. *E. coli* O157 or other VTEC, *Salmonella* sp.; *Bacillus cereus*.

In this context, significant risk means the probability that an incident is likely to occur. The following matters should be considered when assessing this factor:
• the potential for contamination or cross-contamination by the specified micro-organisms;
• the likelihood of survival and growth of the specified micro-organisms;
• the existence of procedures based on HACCP principles and confidence in their implementation, including documentation and records of monitoring of controls;
• the extent and relevance of training undertaken by managers, supervisors and food handlers; and
• whether intervention by the Food Authority is necessary to reduce the probability of an incident occurring.

The additional score must only be applied on a case-by-case basis, must not be applied generically to whole categories of food business establishments, and must be removed at the next inspection if the significant risk no longer exists.

The additional score must also be consistent with the baseline assessment of Confidence in Management/Control Systems. If confidence in management is assessed as 0 or 5, and there is also assessed to be a significant risk of contamination of food with one of the specified micro-organisms, then one of the assessments cannot be correct, and each should be reviewed. Establishments should not pose a significant risk if there is high or moderate Confidence in Management/Control Systems.

<table>
<thead>
<tr>
<th>Score</th>
<th>Guidance on the scoring system</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>Significant risk of food being contaminated with <em>Clostridium botulinum</em>, and the organism surviving any processing and multiplying; or Significant risk of ready-to-eat food being contaminated with micro-organisms, or their toxins, that are pathogenic to humans.</td>
</tr>
<tr>
<td>0</td>
<td>Any other case not included above.</td>
</tr>
</tbody>
</table>

Score: [ ]

Inspection Ratings: [ ] [ ] [ ] [ ] [ ] Total: [ ]

Food hygiene intervention frequencies

<table>
<thead>
<tr>
<th>Category</th>
<th>Score</th>
<th>Minimum intervention frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>92 or higher</td>
<td>At least every six months</td>
</tr>
<tr>
<td>B</td>
<td>72 to 91</td>
<td>At least every 12 months</td>
</tr>
<tr>
<td>C</td>
<td>42 to 71</td>
<td>At least every 18 months</td>
</tr>
<tr>
<td>D</td>
<td>31 to 41</td>
<td>At least every 24 months</td>
</tr>
<tr>
<td>E</td>
<td>0 to 30</td>
<td>A programme of alternative enforcement strategies or interventions every three years</td>
</tr>
</tbody>
</table>

Establishments rated as low-risk (30 or less) need not be included in the planned inspection programme, but must be subject to an alternative enforcement strategy at least once in every 3 years.
APPENDIX 5

LIST OF INTERESTED PARTIES

Heads of Service at English Local Authorities

ABC training
ACADEMY OF CULINARY ARTS
ACTION ON SMOKING & HEALTH (ASH)
ADAMS PORK PRODUCTS
ADAS
Advertising Association
ADVERTISING STANDARDS AUTHORITY
Agricultural Industries Confederation
Airline Operators Committee Cargo
Alcontrol Laboratories
ALFA CHEMICALS
ALLERGY ALLIANCE
Alliance of Independent Retailers
Allied Bakeries Ltd
Allied Brewery Traders’ Association
Allied Meat Importers Ltd
Allied Technical Centre
American Peanut Council
Amicus
AQUINAS COLLEGE
ARLA FOODS PLC
Ascisco Ltd
ASDA Stores
Ashbourne Biscuits
Ashwell Associates
Assoc of the British Pharmaceutical Industry
Associated British Food PLC
Association of Bakery Ingredients Manufacturers
Association of British Health Care Industry
Association of Cereal Food Manufacturers Ltd
Association of Cheese Processors
Association of Convenience Stores
Association of Fish Canners
Association of Independent Crop Consultants
Association of Independent Meat Suppliers
Association of London Government
Association of Meat Inspectors
Association of Port Health Authorities
Association of Public Analysts
Association of Public Analysts of Scotland
ASSOCIATION OF RADICAL MIDWIVES
Association of Scottish Shellfish Growers
Association of Sea Fisheries Committee of England and Wales
ASSOCIATION OF SEA FISHERIES COMMITTEES
Association of Unpasteurised Milk Producers and Consumers
Assured British Meat
Assured Food Standards
Atlantic Bar & Grill
Audit Commission
Automatic Vending Association
Baby Milk Action

Bacardi Martini
BAFSAM
Bakkavor
BARBOUR INDEX PLC
BBSRC Institute of Food Research
Bee Farmers Association
Beer and Pub Association
BERNARD MATTHEWS LTD
Berry Ottaway Associates Ltd
Bestway Cash & Carry Ltd
BETA
BICODE LTD
Bio-Dynamic Agricultural Association
Biotechnology and Biological Sciences Research Council
BIRDS EYE WALLS LTD
BIRMINGHAM CITY LABORATORIES
Biscuit, Cake, Chocolate & Confectionery Alliance
Biscuit, Cake, Chocolate & Confectionery Association
Bonnia Petite Banqueting Ltd
Booker Ltd
Boots PLC
Brewers & Licensed Retailers Association
British Association for Shooting & Conservation
British Association of Feed Supplement & Additive Manufacturers Ltd (BASFAM)
British Bakeries
British Bakers Ltd
British Beekeepers Association
British Beer and Pub Association
British Cattle Veterinary Association
British Chambers of Commerce
British Chambers of Commerce
British Cheese Board
British Coffee Association
British Deer Farmers Association
British Deer Society
BRITISH DENTAL ASSOC
British Diabetic Society
BRITISH EGG INDUSTRY COUNCIL
British Egg Industry Council
British Egg Information Service
British Essence Manufacturers Association
British Fishermen’s Association
British Food Importers and Distributors Association Ltd
British Food Manufacturing Industries Research Association
British Free Range Egg Producers Association
BRITISH FROZEN FOOD FEDERATION
British Frozen Food Federation
BRITISH GOAT SOCIETY
British Hospitality Association
British Importers Association Ltd
British Independent Fruit Growers’ Association
<table>
<thead>
<tr>
<th>British Independent Grocers Association</th>
<th>Chilled Food Association Ltd</th>
</tr>
</thead>
<tbody>
<tr>
<td>British Institute of Agricultural Consultants</td>
<td>Chinese Take Away Association</td>
</tr>
<tr>
<td>BRITISH INSTITUTE OF INNKEEPING</td>
<td>Cinema Exhibitors’ Association</td>
</tr>
<tr>
<td>British International Freight Association</td>
<td>Civic Catering Association</td>
</tr>
<tr>
<td>British Leather Confederation</td>
<td>CLA</td>
</tr>
<tr>
<td>British Marine Finish Association</td>
<td>CMI</td>
</tr>
<tr>
<td>British Meat Processors Association</td>
<td>Coca Cola GB &amp; Ireland</td>
</tr>
<tr>
<td>British Medical Association</td>
<td>Coca-Cola Company</td>
</tr>
<tr>
<td>British Natural Mineral Waters Association</td>
<td>COCERAL</td>
</tr>
<tr>
<td>British Nutrition Foundation</td>
<td>Coeliac UK</td>
</tr>
<tr>
<td>British Oat and Barley Millers Association</td>
<td>Coffee Trade Federation Ltd</td>
</tr>
<tr>
<td>British Pasta Product Association</td>
<td>Cold Storage and Distribution Federation</td>
</tr>
<tr>
<td>British Peanut Council</td>
<td>COMMUNITY FOODS LTD</td>
</tr>
<tr>
<td>British Pepper &amp; Spice</td>
<td>Compassion in World Farming</td>
</tr>
<tr>
<td>British Pest Control Association</td>
<td>CONBA</td>
</tr>
<tr>
<td>British Pig Association</td>
<td>Confederation of British Industry</td>
</tr>
<tr>
<td>British Ports Association</td>
<td>Consortium of Caterers &amp; Administrators (in Education)</td>
</tr>
<tr>
<td>British Potato Council</td>
<td>Continental Food Supplies Ltd</td>
</tr>
<tr>
<td>British Poultry Council</td>
<td>Contract Food Ltd</td>
</tr>
<tr>
<td>British Retail Consortium</td>
<td>Cookery &amp; Food Association</td>
</tr>
<tr>
<td>British Rice Association</td>
<td>CO-OPERATIVE GROUP</td>
</tr>
<tr>
<td>British Sandwich Association</td>
<td>Corporation of London</td>
</tr>
<tr>
<td>British Society of Animal Science</td>
<td>Council for Responsible Nutrition</td>
</tr>
<tr>
<td>British Society of Paediatric Dentistry</td>
<td>Council for the Protection of Rural England</td>
</tr>
<tr>
<td>British Soft Drinks Association Ltd</td>
<td>COUNSEL LTD</td>
</tr>
<tr>
<td>British Starch Industry Association</td>
<td>Country Land and Business Association</td>
</tr>
<tr>
<td>British Sugar</td>
<td>Country Landowners &amp; Business Association</td>
</tr>
<tr>
<td>BRITISH TROUT ASSOCIATION</td>
<td>Country Markets Ltd</td>
</tr>
<tr>
<td>British Trout Association</td>
<td>COVINGTON &amp; BURLING</td>
</tr>
<tr>
<td>British Veterinary Association</td>
<td>Croda Colloids Ltd</td>
</tr>
<tr>
<td>British Wild Boar Association</td>
<td>Crop Protection Association</td>
</tr>
<tr>
<td>Britvic Soft Drinks Ltd</td>
<td>Cypressa</td>
</tr>
<tr>
<td>Budgens Stores Ltd</td>
<td>Daily Mail</td>
</tr>
<tr>
<td>Burger King International</td>
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<td>Business in Sport &amp; Leisure</td>
<td>DAIRY CREST LTD</td>
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<td>Campaign for Real Ale Ltd</td>
<td>Declercq Trading Ltd</td>
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<td>Campden &amp; Chorleywood Food Research Association</td>
<td>DEFRA</td>
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<td>Del Monte Foods Ltd</td>
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<td>DEPARTMENT OF HEALTH</td>
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<td>Caterer &amp; Hotel Keeper Magazine</td>
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<td>Catering Equipment Manufacturers Association</td>
<td>Dept of Agriculture for NI</td>
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<td>CEFIC</td>
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<td>EDLONG COMPANY LTD</td>
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<td>Ethical Consumer Research Association</td>
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<td>EURO COOP</td>
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<td>EuroCommerce</td>
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<td>Chartered Institute of Environmental Health</td>
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<td>CHEMIST &amp; DRUGGIST</td>
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Eurofins Laboratories Ltd
Europe Analytica
European Caterers Association
European Food Law Association (UK Section)
European Modern Restaurant Association
European Public Policy Advisors UK Ltd
Evans Gray & Hood Foods Ltd
EVERSHEDS
F I Data Services
Farley Health Products
Farm Animal Welfare Council
Farming and Countryside Education
Federation of City Farms and Community Gardens
Federation of Small Businesses
Federation of Wholesale Distributors
Federations of Synagogues
Feed Fat Association
Fertiliser Manufacturers Association
Findus Ltd
Fish Producers’ Organisation Ltd
Fishmeal Information Network
Fishmonger’s Company
FLEETWOOD FISH PRODUCERS ORGANISATION LTD
FOOD & HEALTH RESEARCH
FOOD ADDITIVES & INGREDIENTS ASSOCIATION
Food and Drink Federation (FDF)
Food Brands Group
Food Certification International Ltd
Food Commission
Food Futures Co-ordinator
Food Safety Promotion Board
Food Standards Australia New Zealand
Foodware
FORUM OF PRIVATE BUSINESS
FORUM PRODUCTS LTD
FOSFA International
Freedom Food Limited
FREELANCE DIETITIAN & NUTRITIONIST
Fresh Produce Consortium
Friends of the Earth (HQ)
Fruit & Vegetable Canners Association
FSA Northern Ireland
GAFTA
Game Conservancy Trust
Game Farmers Association
GEEST PLC
General Consumer Council
General Dietary Ltd
GIN & VODKA ASSOCIATION
GIRACT
Glaxosmithkline
GOOD HOUSEKEEPING INSTITUTE
Government Chemist
Graig Farm Organics
Grain and Feed Trade Association
Greencore Group
Greenwoods Solicitors LLP
Grimsby Fish Dock Enterprises Ltd
G’s Marketing Ltd
Guild of Fine Food Retailers
H J Heinz Co Ltd
HAFOD
Halal Food Authority
HAMPshire Scientific Services
Harrow London Borough Council
Hartwell Food Research Ltd
HEALAN INGREDIENTS LTD
Health and Safety Executive
Health Food Manufacturers Association (HFMA)
Health Protection Agency
HEATHER PAINE ASSOCIATES
High Commission for the Republic of South Africa
Hilton Group
HM Revenue and Customs
HMPS
Holchem Laboratories Ltd
HOLLAND & BARRETT
Holland and Barrett
Holstein UK
Home Grown Cereals Association (HGCA)
Home Grown Cereals Authority
Honey International Packers Association
Hospital Caterers Association
HOTEL & CATERING INTERNATIONAL MANAGEMENT ASSOCIATION
HOTREC Hotels, Restaurants et Cafes in Europe
Humane Slaughter Association & Council of Justice to Animals
Humane Slaughter Association & Universities Federation for Animal Welfare
Iceland Frozen Foods PLC
ILS LTD
Independent Food Retailers Confederation
Infant & Dietetic Foods Association
Infant & Dietetic Foods Association (IDFA)
Institute of Agricultural Management
Institute of Brewing
Institute of Fisheries Management
INSTITUTE OF FOOD RESEARCH
Institute of Food Science and Technology
INSTITUTE OF MECHANICAL ENGINEERS
Institute of Professionals, Managers & Specialists
INSTITUTE OF REFRIGERATION
INTERNATIONAL FEDERATION OF ESSENTIAL OILS & AROMA TRADES
International Fish Meal & Oil Manufacturers Association
International Meat Trade Association
International Obesity Task Force
Isotron
Ivy House Farm
J RALPH BLANCHFIELD CONSULTANCY
J Sainsburys plc
JG QUICKE & PARTNERS
John Lewis
John Russell Associates
JOHN WEST FOODS LTD
JOHN WYETH & BROTHER LTD
K J Lovering & Co Ltd
KARLSHAMNS LTD
KELLOGG LUX III S.A.R.L.
Kellogg Supply Services (Europe) Ltd
Kettle Foods Ltd
KITCHEN RANGE FOODS LTD
Kraeber (UK) Ltd
Kraft Foods International
Kraft Foods UK Ltd
Kraft Foods UK Ltd
LACORS
LANCASHIRE COUNTY COUNCIL
LAW LABORATORIES LTD
Law Society of Scotland
LAWCODE
Law data Ltd
LEAF
Leatherhead Food International
Lee Kee Kum (Hong Kong) Foods Ltd
Leeds & District Fish Friers’ Association
Leeds City Council
Licensed Animal Slaughterers & Salvage Association
LINKING ENVIRONMENT & FARMING (LEAF)
LIVESTOCK & MEAT COMMISSION
Livestock Auctioneers Association
Local Authorities Co-ordinators of Regulatory Services
Local Government Association
London Chamber of Commerce
London Councils
London Retail Meat Traders Association
LONDON SOUTH BANK UNIVERSITY
M D C Foods Ltd
MACFARLANES
Maltsters Association of Great Britain
Mardon Plc
Margaret Anderson
Marks & Spencer
McCormick (UK) Ltd
Mead Johnson Nutritional Group
Meat and Livestock Commission
Meat Training Council
MERRYDOWN PLC
Micron2
MIDWIVES INFORMATION & RESOURCE SERVICE
MJSR Associates
Muslim Council of Britain
National Association of Agricultural Contractors
National Association of British and Irish Millers
National Association of Catering Butchers
National Association of Cider & Perry Makers
National Association of Health Stores
National Association of Master Bakers, Confectioners & Caterers
NATIONAL ASSOCIATION OF PERRY MAKERS
National Association of Speciality Food & Drink Producers
National Audit Office
National Beef Association
National Board of Catholic Women
NATIONAL CHILDBIRTH TRUST
NATIONAL CONSUMER COUNCIL
National Consumer Council
National Consumer Federation
National Council of Women
National Dried Fruit Trade Association (NDFTA)
National Edible Oil Distributors Association (NEODA)
NATIONAL EDIBLE OIL DISTRIBUTORS ASSOCIATION
National Farmers Union (NFU)
NATIONAL FEDERATION OF FISH FRIERS LTD
National Federation of Fishermen’s Organisations
National Federation of Fishmongers Ltd
National Federation of Meat and Food Traders
National Federation of Women’s Institutes
National Game Dealers Association
National Gamekeepers Organisation
National Heart Forum
National Institute For Health & Clinical Excellence
NATIONAL INSTITUTE OF MEDICAL HERBALISTS LTD
National Market Traders Federation
National Office of Animal Health
National Pharmaceutical Assoc
National Physical Laboratory
National Pig Association
National Renderers Association, Inc
National Sheep Association
Nestlé UK Ltd
NEWSPAPER SOCIETY
NI Food & Drink Association
NORTHAMPTONSHIRE COUNTY COUNCIL
Northern Foods plc
Northern Ireland Meat Exporters Association
Northumberland Sea Fisheries Committee
NORTON ROSE
NOTTINGHAM TRENT UNIVERSITY
NOTTINGHAMSHIRE COUNTY COUNCIL
NUTRAGEN LTD
NUTRICIA LTD
Organic Farmers and Growers Ltd
Organic Food Federation
Organic Mushrooms Committee
Organic Trust
PAI Ltd
Patak’s Foods Ltd
Penta Foods
People 1st
Pepsico International
Perfecta Limited
Perrigo UK
Perry Scott Nash Associates Ltd
Perth & Kinross Council
PLAIN ENGLISH CAMPAIGN
Port Sutton Bridge Ltd
Potato Processors Association
Premier Foods
Prepared Fish Products Association
PROVISION TRADE FEDERATION
Provision Trade Federation
Quintus Public Affairs
Rank Hovis Ltd
Rare Breeds Survival Trust
REAPERS
Red Poll Development Society Ltd
Reindeer Foods Limited
RHM Culinary Branch
RHM Frozen Foods Ltd
RHM Group
RHM TECHNOLOGY LTD
RICHARD GARD ASSOCIATES Ltd
Romford Wholesale Meats Ltd
Royal Association of British Dairy Farmers
ROYAL COLLEGE OF PAEDIATRICS & CHILD HEALTH
Royal College of Pathologists
Royal Institute of Public Health
ROYAL PHARMACEUTICAL SOCIETY OF GREAT BRITAIN
Royal Society for the Promotion of Health
Rural Payments Agency
RYVITA CO LTD
Sainsbury’s Supermarkets Limited
Salmon and Trout Association
SALT MANUFACTURERS ASSOCIATION
Scientific & Regulatory Affairs
Scopa (Seed Crushers' & oil Processors Association
SCOTCH WHISKY ASSOCIATION
SCOTTISH EXECUTIVE RURAL AFFAIRS DEPT
SCOTTISH FOOD & DRINK FEDERATION
Scottish Landowner Federation
SEA FISH INDUSTRY AUTHORITY
Sea Fish Industry Authority
Seed Crushers & Oil Producers Association
Seven Seas Ltd
Shellfish Association of Great Britain
SHS International Limited
SITPRO
Small Business Service
Smithfield Tenants’ Association
Snack, Nut & Crisps Manufacturers Association
SOCIETY OF FOOD HYGIENE TECHNOLOGY
Society of Independent Brewers
Society of Occupational Medicine
Soil Association
Somerset Stores Limited
SOMERFIELD STORES LTD
SOMERSET COUNTY COUNCIL
Somerset NHS
SOMERSET SCIENTIFIC SERVICES
Specialist Cheese Makers Association
STEPHEN RHODES ASSOCIATES
Stilton Cheese Makers Association
STUTE FOODS LTD
Sugar Bureau
SUPPORT, TRAINING & SERVICES LTD
SURREY COUNTY COUNCIL TRADING STANDARDS
Sustain

T Miller
TASTE OF THE WEST
TEA BUYERS ASSOCIATION
Tenant Farmers Association
Tesco Stores plc
THOMAS LOWNES and Co Ltd
THORNTONS PLC
Townswomen’s Guild
Trading Standards Institute
Traditional Farm Fresh Turkey Association
Transparency data
Transport & General Workers Union
Typhoo Tea Ltd
UK ASSOCIATION OF FROZEN FOOD PRODUCERS
UK Association of Frozen Food Producers
UK Association of Manufacturers of Bakers Yeast
UK Maize Millers Association
UK Major Ports Group
UNILEVER PLC
Unilever Research
UNISON
United Kingdom RVO Processors Association
United States Department of Agriculture
University of Birmingham
UNIVERSITY OF CENTRAL LANCASHIRE
University of Liverpool
UNIVERSITY OF SUSSEX
UWIC
VEGA (Vegetarian Economy & Green Agriculture)
Vegan Society
Verner Wheelock Associates Limited
Veterinary Laboratories Agency
Viva/Vegetarian & Vegan Foundation
Waitrose Ltd
Weblabs
Weetabix Limited
WEST YORKSHIRE JOINT SERVICES
Westl er Foods Ltd
Which?
Whitehouse Consultancy Ltd
Whitworth Food Group
Wine & Spirit Trade Association
Women’s Food and Farming Union
Worshipful Company of Butchers
York Nutritional Laboratory
Yorkshire & Lincolnshire Fish Farmers