

Consultation response template



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Question 1. Does the layout / presentation of the proposed revisions to the Code facilitate consistent interpretation? If not, how could they be improved?

Mid Ulster District Council agrees that the presentation and layout of the revisions of the Code facilitate consistent interpretation.

Question 2. Do you agree that the proposed changes to the food standards intervention rating scheme provide DCs with the ability to deploy current resources more effectively by improving the way in which the levels of risk and compliance associated with a business are assessed? If not, why not? (Please specify any aspects of the new model which require further consideration, and why).

Mid Ulster District Council agrees that the proposed changes to the food standards intervention rating scheme does provide District Councils with the ability to deploy current resources more effectively as the proposed matrix will enable focus on non-compliant businesses. The proposed scheme provides for a more realistic assessment of risk by assessing inherent risk and business compliance separately which provides for a more proportionate and targeted enforcement regime.

Question 3. Do you agree that the proposed frequencies for official controls, specified in the decision matrix, within the new food standards intervention rating scheme are appropriate based on the levels of risk and compliance associated with the business? If not, please identify any concerns you have with the proposed frequencies.

Mid Ulster District Council is of the opinion that the proposed frequency of 6 & 10 years is too long a period to leave a business uninspected as business activities could significantly change in this time. Mid Ulster District Council also believes that the priority intervention frequencies of 1 month will be onerous especially as these require an inspection, partial inspection or audit. The FLCOP should be clear if a re-score can be undertaken after assessment of the non-compliance identified in the priority intervention rather than completing a full inspection, partial inspection or audit provided other areas of the businesses activities have remained the same.

Question 4. Do you foresee any problems with the proposals under consultation? If yes, please outline what these problems are and what, if any, solutions we should consider?

Mid Ulster District Council foresees problems in the mapping of data for the new Food Standards model and subsequent implementation. Mid Ulster District Council is concerned regarding the mapping of data from the current scheme as some of the required fields in the risk assessment have not been scored previously in this format. Management information systems will require significant revisions; such revisions will take considerable time and verification to ensure the data has mapped correctly. Mid Ulster District Council also anticipates a large volume of premises will require an inspection in the initial period of operating the new model, which will put additional resource pressures on the Environmental Health department. Mid Ulster District Council is aware that a number of proposals such as the Scenario rule (page 91) and the additional compliance risk factor for allergen information (page 90) were not included in the pilot and therefore the impact on workload has not been assessed. Mid Ulster District Council would anticipate a significant increase in priority interventions resulting from these changes and would request that the impact of these changes is evaluated. Mid Ulster District Council also anticipates difficulties with food service planning due to the reactive nature of the new model. It will be difficult to estimate the numbers of planned interventions as a premises requiring a priority intervention may require multiple interventions in year. In addition, this will be further complicated due to the intelligence element of the model.

Question 5. Do you agree with our assessment of the impacts on DCs and our assumptions on familiarisation resulting from the proposed changes to the Code? If not, why not?

Mid Ulster District Council does not agree that the assessment on impacts accurately reflects the true costs of implementation of the proposed scheme. The assessment specifies FTE of 31 officers. This is a significant underestimation of officers due to the fact that officers in Northern Ireland undertake combined food hygiene and food standards work so the true number should be a combination of Food Hygiene and Food Standards FTE figures. Mid Ulster District Council does not believe that 1.7 hours per officer will be sufficient for familiarisation. The FSA should include ongoing consistency exercises during the initial role out and implementation of the revised scheme to ensure consistency in application across Northern Ireland. There is an unknown cost specified for updating of MIS and mapping data to the new model. Mid Ulster District Council anticipates that this will be a significant cost, both in terms of officer time and IT resource, and would appreciate clarification on financial support available for this.

Question 6. Do you foresee any other impacts from the implementation of the main proposals detailed beyond those we have identified? Where possible, please explain your views and provide quantifiable evidence (for example, costs associated with updating existing procedures, the benefits of greater flexibility to allocate staff to activities).

Mid Ulster District Council does not foresee additional impacts other than those noted in the previous question.