



Welsh Government Consultation

**Our Ambition to Further Develop Wales'
Food and Drink Sector**

**Response of the Chartered Institute of
Environmental Health (CIEH) in Wales**

15 October 2019

About the Chartered Institute of Environmental Health (CIEH)

The CIEH is the professional voice for environmental health representing some 8,000 members working in the public, private and non-profit sectors. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

For more information visit www.cieh.org and follow CIEH on Twitter @The_CIEH.

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This submission

In producing this submission, the CIEH has drawn on comments provided by its members. The CIEH is extremely grateful for their assistance.

Introduction

The CIEH has members working across Wales to ensure food is safe and what it says it is. They work in the public, private and third sectors, making a real difference, training food handlers, working for food businesses advising them of their legal obligations and, in local authorities delivering food official controls.

Local authority Environmental Health Practitioners, in conjunction with the Food Standards Agency are committed to ensuring consumers have the necessary information to make informed choices about where they eat and purchase food through their participation in Wales' flagship mandatory Food Hygiene Rating Scheme. The scheme has been extended in Wales to i) include businesses that supply other businesses and ii) to require ratings information to be provided on publicity materials produced by establishments that supply takeaway food direct to consumers.

We are pleased that the Welsh Government, in its ambition to further develop Wales' food and drink sector, has continued to demonstrate its ongoing commitment to the Food Hygiene Rating Scheme by including, as one of its five headline targets, 95% of food and drink sector businesses to have a food hygiene rating of 4 or 5 by 2026.

CIEH Response to Consultation

The CIEH welcomes the Welsh Government and the Food and Drink Wales Industry Board's joint proposals for a strategic plan to further advance the food and drink sector in Wales for the period 2020- 2026 and endorses the vision set out in the consultation document *'To create a strong and vibrant Welsh food and drink sector with a global reputation for excellence, having one of the most environmentally and socially responsible supply chains in the world'*

We have focused our comments on the proposals in the document to those areas where Environmental Health Practitioners have the greatest potential to impact.

To grow the sectors scale

The CIEH notes the ambitious target set for the turnover value of the food and drink sector to grow annually to match the change in the Consumer Price Index (CPI), plus an additional 2%.

We share the ambition for more businesses to start up and more to survive longer, for micro businesses to become small businesses, small businesses to become medium businesses and medium businesses to become larger businesses. Environmental Health Practitioners are able to provide vital support for new businesses before they start trading. This helps them to set up for success. Under the current regulatory system, businesses can start trading without the benefit of this assurance and in some cases, further down the line this has cost implications for businesses. Most consumers believe, incorrectly that businesses have to demonstrate they have the capacity and capability to provide food that is safe and what it says it is before they can start to trade. We will lobby for changes in the legislation to ensure businesses are provided the support they need to get off to a good start and have the benefit of a 'permit to trade' which provides them with confidence and a high level of assurance from day one. Consumers will also benefit in the knowledge that this independent oversight and assurance has been provided.

To promote Wales as a food nation

Currently, only 30% of the food and drink sector in Wales benefit from inclusion in widely recognised industry food accreditation schemes such as SALSA and BRC. Such accreditation opens doors to sales and is essential for entering any significant trade with large retailers, wholesalers and to export. We note the Welsh Government's target for 300 businesses in the food and drink manufacturing sector to hold appropriate accreditation by 2026 which it has estimated will increase the proportion to 50%. We commend the Welsh Government for acknowledging that third party industry accreditation and independent inspections by local authorities to generate food hygiene ratings are complimentary and that both have a place in providing assurance. We believe that independent inspection by local authorities should be maintained at the current level to provide

potential trading partners with confidence and assurance about the quality and safety of Welsh food and drink. For the benefit of consumers, and to protect Welsh businesses, we will resist any attempt to dilute this form of assurance whilst at the same time encouraging our members to provide information and advice to businesses as appropriate about industry accreditation schemes.

The ambitious target of 95% of food and drink sector businesses in Wales having a food hygiene rating of 4 or 5 by 2026 is strongly supported by the CIEH. The food hygiene rating scheme has already driven up food hygiene standards in Wales and this target has the potential to drive further improvement. Achieving the target will require concerted effort on the part of businesses and regulators. The consultation document acknowledges some of the challenges faced by industry as a consequence of workforce shortfalls but the same challenges face the Environmental Health workforce. To maintain the credibility of the Food Hygiene Rating Scheme in Wales, ratings must be issued at the required frequencies. Outdated ratings compromise the ability of consumers to make informed choices. Timely ratings depend on an adequately resourced workforce. In 2018/19 there were only 139 full time equivalent local authority Environmental Health Practitioners across Wales delivering food hygiene controls at over 135,000 food businesses. We urge the Welsh Government to acknowledge the crisis in recruitment and retention of Environmental Health Practitioners and to work with the Food Standards Agency and the CIEH to explore models for a more sustainable workforce. This will be vital in maintaining the integrity of the Food Hygiene Rating Scheme in Wales.

Exports

73% of Welsh food and drink exports are to the EU. We appreciate the BREXIT challenges faced by micro and SME businesses and that more than ever they will be reliant on Environmental Health Practitioners for support. We have taken action to assist Environmental Health Practitioners in Wales to carry out their role as Certifying Officers for exports of certain products of animal origin. This will ensure businesses wishing to export have access to suitable levels of support.

In conclusion we commend the Welsh Government for identifying ambitious SMART targets to further develop the food and drink sector in Wales, particularly in relation to food hygiene ratings.

However, we would urge the Welsh Government to acknowledge that austerity has impacted on the capacity of the Environmental Health workforce to provide vital business support and that the sustainability and credibility of the Food Hygiene Rating Scheme in Wales is reliant on an adequately resourced Environmental Health workforce.