

24 January 2011

Lord Jeff Rooker
Chairman
Food Standards Agency
Aviation House
125 Kingsway
London
WC2B 6NH



Dear Lord Rooker,

**Food Safety Official Controls Delivery Review
FSA Board meeting 25th January 2011**

Further to my letter to Tim Smith (copy attached). Following our meeting last week and subsequent discussions with Tim I have now considered the report to the next Food Standards Agency Board (FSA) meeting on the delivery of Food Safety Official Controls. As discussed this is a matter of great importance to the Chartered Institute of Environmental Health (CIEH) as an organisation focused on promoting the need for high standards of public health and public protection. CIEH is also the main UK professional body educating and training individuals to manage compliance with food safety legislation, as well as being the largest awarding body for accredited training programmes in food safety.

CIEH recognises many of the concerns expressed in the Board paper about the future delivery of Official Controls, particularly in light of current and future budget restrictions in the public sector. We recognise also the need for consistent and reliable enforcement to protect consumers and support businesses in meeting their legislative obligations. As such the proposal for a review appears timely but there are risks that confidence in food and food regulators may be undermined if the work is not seen to be fully inclusive and completely open and transparent. Consequently, we are pleased to see the proposal to involve external stakeholders and believe that inclusion of the full range of interested parties will be essential to reaching robust conclusions that will stand up to detailed scrutiny. We believe that the establishment of a Review Steering group, composed of FSA officials and key external stakeholders would deliver optimum outcomes and be fully in line with the core values of the FSA as an open, accessible and transparent organisation. The CIEH, as a key stakeholder, would wish to play a full part in the proposed review, particularly as a member of such a Steering group.

Whilst the details of the review remain to be finalised the CIEH would suggest that it should consider not only areas of potential weakness but also areas where there is significant value to be found in the current arrangements, a point not emphasised in the Board paper. We believe that a particular strength of local delivery is the ability to develop trust and good working relationships with local businesses, particularly the small independent businesses that form the majority of the food sector. Many of these do not belong to any representative trade organisation and rely on contact with local regulators to achieve compliance. It seems doubtful that such relationships could be fully replicated with more centralised delivery models. Some other examples of the strengths of local delivery include;

- Accessibility; “Face to face” provision of business support and the ability to respond directly to consumer queries and requests
- Development of local intelligence; allowing the identification of the most suitable interventions and the need for urgent action.
- Partnership working across and beyond the local authority base e.g. combining food hygiene and health and safety inspections (as recommended in Lord Young’s report “Common sense Common safety”); working with other local authority regulatory services such as planning and licensing; working with public health teams to allow rapid response to infectious disease outbreaks; and building partnerships with the business community to deliver improvements in food safety (and improve diet and nutrition).

A key component of any delivery model must be the competence of those tasked with applying the controls. We have previously expressed concerns about the emergence of lesser qualified compliance assessors without the core knowledge and skills to effectively protect public health We would not wish to see public protection diminished by the use of inadequately skilled and less than competent enforcement staff and the subsequent undermining of public and trade confidence in UK regulatory compliance infrastructure in producing and marketing safe food either in the UK or overseas.

The CIEH has worked consistently with the FSA and with European partners to ensure that our qualification framework produces practitioners with the underpinning key knowledge and core skills to deliver effective food safety controls. We fully recognise that competence is fully developed in the workplace and have worked with FSA to identify and address these specific training needs. Currently, with support from the FSA, we are working to develop the Food safety competence framework against which practitioners can be assessed to ensure they remain “fit for purpose”, wherever they are employed. This work is essential and we anticipate will be informed by the results of the review.

The terms of reference about which we have previously corresponded has not been referenced in the Board papers and we urge the Board through the review to consider these issues, alongside a range of other matters. I attach the presentation given by Tim Everett CIEH Executive Director of Professional Services to the Joint CIEH /FSA “Future Food Hygiene” conference where the review was announced. It provides a very good overview of where we currently are and warns that “you don’t know what you’ve got till it’s gone” as a key point for the review process to take into account. In reaching any conclusions about the best arrangements to deliver food safety controls in the future the total impacts on public health will need to be fully assessed and CIEH stands ready to play a full part in this process.

Yours sincerely,



Graham Jukes
Chief Executive