

### **Consultation on the Food Hygiene Rating (Wales) Bill**

Thank you for the opportunity to comment on this Bill. I am responding on behalf of the British Sandwich Association, The Pizza Pasta & Italian Food Association and the Café Society, all of which operate out of these offices. All three Associations support the principles behind the Food Hygiene Rating Scheme in the UK.

We would like the following views to be taken into account.

1. While we generally welcome the introduction of a mandatory scheme, we have concerns over the consistency of auditing by some local authorities. While some do an excellent job, this is not always the case. There are also differences of opinion between inspectors on the interpretation of regulations and also on different aspects of practices operating in food businesses. Not all those involved have specialist knowledge in some areas of food production. A bad audit and rating could do immense damage to a business and we are concerned that there should be sufficient safeguards to ensure that negative ratings are fully justified before they are made public knowledge.
2. Businesses should be given details of their rating assessments in writing and should have the option to put minor issues right that can easily be resolved before their rating is made public knowledge. One of the key benefits and objectives of a scheme like this should be to encourage better standards.
3. There must be an opportunity for businesses to appeal prior to their rating being made public. Initially appeals might be considered by a panel within the authority but if the business is still unhappy with the outcome of this there should be an independent process of appeal as last resort. This will not only give some assurance to businesses over the fairness of the system but also some protection to local authorities over any claims for damage to businesses caused by the scheme.
4. Concerns have been expressed over the time it may take for re-inspections, particularly in situations where a business may be given a low rating but may then undertake work to correct faults. We would recommend that authorities should be asked to make a commitment to undertake re-inspections within specified time period.
5. There is considerable concern over the charges that may be levied by different authorities for re-inspections and that some local authorities may see this as an opportunity for boosting revenues. We would urge the Assembly to set in place a recommended level of charges for re-inspections, appeals etc.
6. Action must be taken by the Welsh Assembly to promote the scheme to the public so that they fully understand the rating system as there is a serious danger that it may otherwise be confused with other star rating schemes.

Yours sincerely

Jim Winship  
Director