

ADVICE FROM THE CONSUMER COMMITTEE TO THE BOARD ON PRIOR APPROVAL; SAFER FOOD, BETTER BUSINESS; AND BUTCHERS' LICENSING

1. The main purpose of the Consumer Committee is to ensure that the FSA's policy making is open to a wide range of consumer interests and that decisions are based on a full understanding of consumer needs and views. The Committee consists of a Chair and up to 11 members. Some members have been appointed from the main consumer organisations in the UK. Others have been appointed from open competition.
2. At their meeting on 2 March 2005, the Consumer Committee discussed three issues: Prior Approval, Safer Food Better Business and Butcher's Licensing. This short paper summarises the advice of the Committee to the Agency's Board.

Prior Approval

3. The Consumer Committee unanimously agreed that every food premise should be given prior approval before it was allowed to trade. They also felt that it was important that the Agency considered the following issues:
 - Better regulation should not be confused with less regulation. At times, more (and effective) regulation is needed in order to protect consumer interests.
 - Consumers should be given further information about how food premises are allowed to trade and how premises are meeting the standards that have been set for them.
 - The prior approval process would help businesses to start as they mean to go on.
 - Food premises should have access to a range of support/advice and guidance in order to enable them to fulfil the requirements of the prior approval process. (It was noted however, that ideally this support should be 'independent' and not dependent on contact with the various enforcement

bodies, although the Committee recognised the complexities of funding and organising such a service)

- Local Authorities would not necessarily incur any additional costs, as the prior approval process would help to prevent food safety failures in the future.
- The advantages therefore in terms of protecting public health, is an actual, rather than just a perceived benefit.
- Food businesses are not homogenous so different approaches may be needed depending on the level of risk with follow up assessment as appropriate.

Safer Food, Better Business

4. The Committee considered the issue of Safer Food, Better Business and provided the following advice to the Agency's Board.
 - The timing of the introduction of the Safer Food, Better Business initiative needed some further consideration. As food businesses have to comply with the new regulations on the 1st January 2006, the Committee thought that the materials and any other support should be introduced as soon as possible.
 - Support should be provided to the smaller or micro food businesses in order to help them to comply with the new standard. The Committee unanimously agreed that this advice and support should ideally be provided independent of enforcement officers.
 - To ensure that the consumer was being put first, information should be made publicly available and displayed where it would have most impact. This might be through scoring, points or award schemes.
 - If Prior Approval is introduced the Safer Food Better Business process should be incorporated into that system.

Butcher's Licensing

5. The Committee having discussed Prior Approval unanimously agreed that Butcher's Licensing should also be retained. The following points were raised during the discussion:

- Butcher's licensing ensured that butcher's shops are inspected on an annual basis. This in part provided some assurance to consumers that high standards were being monitored and maintained and is important discipline for the business.
- The consultation expressed the view that the new EU regulations provided an equivalent level of public health protection as the current licensing system. The Committee had some concern that whilst in theory this may happen, whether in practice there would be equivalent monitoring and enforcement.
- The Committee recognised that handling unwrapped raw meat and ready to eat food was a high-risk area. Unless there is some guarantee that the standards (that the UK and the butchers' trade have worked hard to reach) could be maintained, the Agency would be taking an undue risk in withdrawing the licensing system that was currently in place and working effectively.