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Response to the Food Standards
Agency consultation : Guidelines for
the development of national voluntary
guides to good hygiene practice and
the application of HACCP principles

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1. General

1.1 The Chartered Institute of Environmental Health (CIEH) welcomes the opportunity to comment on the Food Standards Agency consultation on the guidelines for the development of national voluntary guides to good hygiene practice and the application of HACCP principles. CIEH believes that guides to good hygiene practice play a key role in assisting the achievement of compliance with legislative requirements.

1.2 Since 1997, some 140,000 guides to good hygiene practice have been sold, of which some 80,000 were the catering sector guide. Sales have been to both food business operators and to local authorities, indicating the value that is placed upon them. CIEH believes that the guides provide a consistent approach to achieving compliance and assist businesses in “getting it right first time”. CIEH, therefore, fully supports the production of new guides and hopes that there will be significant industry interest in their production.

1.3 In the interim, clarification will need to be given about the status of existing guides as, if they were to be withdrawn, it is likely to create a significant gap in support, especially for the smaller less developed businesses. CIEH would be pleased to offer its assistance in the development of any new guides.

2. Prioritisation of Guides

2.1 Whilst it is accepted that resource limitations may require the prioritisation of guide production, given the large number of sales of Guides for the Catering Sector, it is suggested that the revision of this guide should be given a high priority.

3. Guidance on HACCP procedures

3.1 Experience from previous guides has shown that detailed identification of relevant food hazards in a given sector has been welcomed, particularly by the small and less developed businesses. There has been considerable variation in the extent to which this issue has been addressed in the existing guides. It would be recommended that detailed attention is given to the issue in new guides, which should also make reference to nationally supported tools for the implementation of food safety management systems.

4. Publication and dissemination of guides

4.1 Availability and ease of access to the guides must be a key priority. Whilst there may be good reason to make guides available on the internet, hard copy publications should also be provided to ensure wide accessibility. If guides are to be priced publications, then they must be reasonably priced. The current costs of around £3.60 appear to be reasonable and do not appear to have created barriers to purchase. As a consequence it is suggested that any future publications should be within a similar price range.

5. Advice on food safety training and instruction

5.1 The CIEH believes that high quality food hygiene training is essential if food is to be handled safely. Appropriate training should not just be a “one off” event but should

be given before a food handler begins work and should be regularly updated over their time of employment. The quality of training can be variable and food businesses must ensure that any training that is provided is of the appropriate scope, level and standard. Such training will provide a solid foundation on which appropriate supervision and instruction arrangements can be built.

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