

FOOD STANDARDS AGENCY CONSULTATION
Title: The Food Hygiene Rating (Online Display) Regulations (Northern Ireland) 2017
CONSULTATION SUMMARY PAGE

Date consultation launched:	Closing date for responses:
21 April 2017	14 July 2017

Who will this consultation be of most interest to?

Consumers, district councils and their representative and professional bodies, and food businesses and their representative bodies.

What is the subject of the consultation?

This consultation is about secondary legislation needed to implement the statutory food hygiene rating scheme established by the Food Hygiene Rating Act (Northern Ireland) 2016 with regards to the online display provision.


What is the purpose of this consultation?

The FSA is seeking views and comments from stakeholders on the draft Food Hygiene Rating (Online Display) Regulations (Northern Ireland) 2017, and the potential impact on food businesses and district councils.

Responses to this consultation should be sent to:
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 Delivery Team

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Is an Impact Assessment included with this consultation?

Yes

No See Annex A for reasons



If you would prefer to receive future FSA consultations by e-mail, or if you no longer wish to receive information on this subject please notify the named person in this consultation


FOOD HYGIENE RATING

Eating out? Getting food in? Check food.gov.uk/ratings

IMPACT OF MANDATORY DISPLAY OF FOOD HYGIENE RATINGS ONLINE IN NORTHERN IRELAND

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Introduction

1. The Food Hygiene Rating Scheme, which is a Food Standards Agency (FSA) and district council partnership initiative, is a key public health measure and an important commercial driver for businesses to achieve and maintain compliance with existing food hygiene law. It provides transparency to consumers about the hygiene standards in food outlets at the time of inspection by district council food safety officers. This allows consumers to make informed choices about where they eat out or shop for food. The aim is to give recognition to businesses that meet the requirements of food hygiene law and provide an incentive to improve to those that do not. FSA research findings provide evidence that the scheme is working and driving up food hygiene standards.
2. We recognise that ongoing success in achieving the scheme's objective depends on consumers having access to the ratings at the right time and the right place for them, including at the point of choice. Our research shows, however, that the proportion of businesses displaying ratings at their establishment is low, particularly for those with low ratings. We considered that a statutory approach that makes it mandatory for businesses to display their rating in a prominent position would strengthen the scheme. Making ratings more accessible in this way will provide a more integrated approach to ensuring the information is widely available and this would increase the scheme's potential to improve public health and help drive competition in the market and business growth more quickly and effectively. With an increasing trend for consumers to purchase food online a key provision within the Act is for online display of a food hygiene rating to further increase the accessibility of this information.

Where are we now? The Food Hygiene Rating Act (Northern Ireland) 2016

3. The Food Hygiene Rating Act (Northern Ireland) 2016 received Royal Assent on 29 January 2016. The main provisions within the Act came into force on 7 October 2016 with the implementation of the Food Hygiene Rating Regulations and associated Orders. The Act and associated secondary legislation is available at the following links:
<http://www.legislation.gov.uk/nia/2016/3/section/1/enacted>
<http://www.legislation.gov.uk/nisr?title=food%20hygiene%20rating>
4. The Act establishes a statutory food hygiene rating scheme in Northern Ireland, which requires district councils, following an inspection, to produce a food hygiene rating for businesses within scope of the scheme using criteria published by the FSA. Businesses that have been rated will be provided with a sticker(s) showing their food hygiene rating which they will be required to display in one or more designated positions at their establishment. In addition, the business will be required to ensure that anyone who asks for verbal confirmation of a rating is given that information. Secondary legislation was required to underpin the provisions of the Act, the majority of which came into effect on the 7th of October 2016. The last remaining provision of the Act which requires underpinning secondary legislation is the online display requirement.

5. The Act includes a regulation making power regarding the publication of ratings online by food business operators who supply consumers with food that they order using an online facility. This provision was introduced into the Act through an amendment to the Bill during the legislative process. In order to adequately inform the drafting of underpinning legislation required, we gathered evidence and information from stakeholders on how this can work in practice before drafting the regulatory measure. This included research to explore consumer needs and expectations on online display of ratings and engagement with businesses that will be affected.

How will consistency of operation by district councils be achieved?

6. Consistency of implementation and operation of the statutory scheme by district councils in Northern Ireland is underpinned by FSA guidance – ‘Implementation and operation of the statutory Food Hygiene Rating Scheme in Northern Ireland Guidance for district councils’. Due to the technical nature of the online display provision a specific section regarding online display will be included within this guidance.
7. We are conducting further research and development into ‘digital icons’ that will be provided to business to assist them in complying with this requirement. This research and development will form a key part of the guidance specific to the Online Display regulations. This guidance will be issued following the completion of said research and District councils will be required to have regard to this guidance when exercising functions under the Act. Guidance will also be produced for food business to assist them the use of ‘digital icons’ in order to comply with the requirements of these regulations.

Regulatory Impact Assessment

8. A draft Regulatory Impact Assessment (RIA) has been prepared specifically for the secondary legislation that this consultation relates to and can be found at [Annex B](#). This RIA outlines all of the costs and benefits associated with the introduction and operation of the statutory online display provision.

Proposals for the draft Food Hygiene Rating (Online Display) Regulations (Northern Ireland) 2017

9. Whilst the main provisions of the new statutory food hygiene rating scheme are specified within the Act, the Act gives the Department of Health ('the Department') power to make regulations dealing with various matters of detail. This part of the consultation paper gives details of the proposed Regulations and asks questions about them. **This information should be read in conjunction with the Act and the draft Regulations.**

Regulation 1: Citation and commencement

This regulation states that the Regulations may be cited as The Food Hygiene Rating (Online Display) Regulations (Northern Ireland) 2017. It is proposed that Regulations will commence immediately following completion of the draft affirmative legislative process for the Regulations in the Northern Ireland Assembly. Due to the nature of this legislative process we are unable to specify the period of time required for its completion and therefore a commencement date. However it is anticipated that the draft affirmative process will not be completed before September 2017.

This regulation also defines that a "specified online facility" means a website or an application by which an order for food can be placed online and a social media site inviting consumers to place an order for food online. With regards to the social media scenario this is not restricted to a direct ordering facially rather it maybe an invite to 'private message' or other related electronic provisions that can result in food being ordered.

Question 1 – Do you agree with the proposed commencement date which will be immediately following the legislative process? If you consider an alternative date appropriate please specify this and provide a rationale.

Question 2 – Do you have any comments regarding the definition of a "specified online facility" which will bring certain businesses within scope of this requirement? If you think that this definition has included or excluded certain business in the scheme that should or should not be, please provide details and a rationale of why they should be included or excluded.

Regulation 2: Online provision of Food Hygiene Rating

This regulation states that food business operators supplying consumers with food ordered using a specified online facility must on that facility

- a) display an icon representing the valid food hygiene rating for that establishment where it can be readily seen and easily read at the point food can be selected to order; and
- b) where the specified online facility relates to more than one food business establishment that facility must also display that icon at any point the food business establishment can be selected.

This means that each food business will have to display an icon representing the valid food hygiene rating for the establishment the online ordering facility relates to. Such an icon must be located where it can be readily seen and easily read at the point food can be selected to order. If an online facility for a food business relates to more than one establishment then an icon displaying a valid food hygiene rating for that establishment must be displayed. In this case the icon must clearly indicate which rating belongs to which establishment at the point a particular establishment can be selected.

The design & use of the 'icon' referred to in Section 2 will be outlined in guidance that will accompany the regulations, the icon will display a valid food hygiene rating. This guidance will provide icons that will assist food businesses in complying with the online display provision. We commissioned an independent research company to consult with business and consumers to design a digital icon that is effective in providing the consumer with the information they require and is functional for business use. (see 'FHRS online display icon/badges' section below)

Question 3 – Do you have any comments on Regulation 2 regarding the location and manner of display of food hygiene icon?

Question 4 – Do you have any comments on Regulation 2 regarding the identifying of the food businesses establishment to which the food hygiene rating or icon relates?

Regulation 3: Online provision of Food Hygiene Rating: Multiple establishments with a single operator

As it is not always feasible for certain businesses to know exactly what establishments food will be supplied from at the point where food is ordered online (i.e. home shopping from a large chain supermarket which may be supplied by several establishments), the draft regulations have made a separate provision for such businesses.

If an operator of more than one food establishment within scope does not specify at the time of ordering which establishment the food will be supplied from, the online facility must display an icon:-

- a) providing a link to a list of valid food hygiene ratings identifying the food business establishment to which it relates for any establishment which may supply the order.

The icon must be readily seen and easily read at the point food can be selected to order from that food business establishment.

This Regulation will require any food business not identifying what establishment the food is coming from to display an icon. This icon must provide a link to a separate page, within that food businesses online platform, which will list all the establishments from which the food order may come from. On this page the establishments listed must clearly identify their individual food hygiene rating.

Question 5 – Do you have any comments regarding Regulation 3?

Regulation 4: Time for publication of rating online

This Regulation specifies the time scale in which businesses within scope must comply with the requirements stipulated in Regulation 2 and 3. Food businesses must display a valid rating or icon within 28 days of the date on which a food hygiene rating for an establishment is published online by the Food Standards Agency, as required by the Food Hygiene Rating Act (Northern Ireland) 2016.

Question 6 – Do you agree with the proposed specified time period for publication, If not please state why and provide a rationale for an alternative period.

FHRS Online display icon/badge

Independent research into the design of an online food hygiene rating has now been concluded and digital icons have been produced, these icons are provided in Annex F. The icons/badges have been designed to cater for all online platforms and can be freely accessed from the FSA.

We are also developing a service that will allow businesses to embed these icons/badges into digital services using a small piece of code. The code will use underlying data to automatically update the rating displayed on your site. Please note: the draft badges you download will not update automatically.

We encourage food businesses to download the images provided in Annex F for testing on their digital service and to provide comment on the icon/badge design and usage.

Question 7 - Do you have any comments or views on the design and usage of the draft icons/badges.

Question 8 - Do you have any other comments or views on the draft Regulations described in this document?

Consultation process and next steps

10. Further information on the consultation process is provided at [Annex A](#).
11. During the consultation period, the FSA will explore consumer views in relation to online display provision set out in section 7(3) of the Act through independently conducted research. This research will inform the development of 'digital icons' which will support food businesses in complying with the online display requirement. The results from this research will also form a key part of the guidance produced to support the implementation of the online display regulations.

Other relevant documents

12. Documents relevant to this consultation include:
 - The Food Law Code of Practice (Northern Ireland)
<http://www.food.gov.uk/enforcement/enforcework/foodlawcop/copni/>
 - The Food Hygiene Rating Act (Northern Ireland) 2016
<http://www.legislation.gov.uk/nia/2016/3/section/1/enacted>
 - The Food Hygiene Rating Regulations (Northern Ireland) 2016
<http://www.legislation.gov.uk/nisr/2016/313/contents/made>
 - The Food Hygiene Rating (Fee and Fixed Penalty Amount) Order (Northern Ireland) 2016
http://www.legislation.gov.uk/nisr/2016/425/pdfs/nisr_20160425_en.pdf

- Implementation and operation of the statutory Food Hygiene Rating Scheme in Northern Ireland. Guidance for district councils.

<https://www.food.gov.uk/northern-ireland/niregulation/niguidancenotes/fhrsni-implementation>

Responses

13. Responses are required **by close Friday 14 July 2017**. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation/company (including details of any stakeholders your organisation represents). A consultation response form is provided at Annex D.
14. Thank you on behalf of the Food Standards Agency for participating in this public consultation.

Yours faithfully,

Mark O'Neill
Local Authority Policy and Delivery

Enclosed

Annex A: Standard consultation information

Annex B: Draft Regulatory Impact Assessment

Annex C: Draft Regulations

Annex D: Consultation response form

Annex E: Interested parties list

Annex A: Standard Consultation Information

Queries

1. If you have any queries relating to this consultation please contact the person named on page 1, who will be able to respond to your questions.

Publication of personal data and confidentiality of responses

2. In accordance with the FSA principle of openness we shall keep a copy of the completed consultation and responses, to be made available to the public on receipt of a request to the [FSA Consultation Coordinator](#) (020 7276 8140). The FSA will publish a summary of responses, which may include your full name. Disclosure of any other personal data would be made only upon request for the full consultation responses. If you do not want this information to be released, please complete and return the Publication of Personal Data form, which is on the website at <http://www.food.gov.uk/multimedia/worddocs/dataprotection.doc>. Return of this form does not mean that we will treat your response to the consultation as confidential, just your personal data.
3. In accordance with the provisions of Freedom of Information Act 2000/Environmental Information Regulations 2004, all information contained in your response may be subject to publication or disclosure. If you consider that some of the information provided in your response should not be disclosed, you should indicate the information concerned, request that it is not disclosed and explain what harm you consider would result from disclosure. The final decision on whether the information should be withheld rests with the FSA. However, we will take into account your views when making this decision.
4. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

Further information

5. A list of interested parties to whom this letter is being sent appears in Annex E. Please feel free to pass this document to any other interested parties, or send us their full contact details and we will arrange for a copy to be sent to them direct.
6. Please let us know if you need paper copies of the consultation documents or of anything specified under '**Other relevant documents**'.
7. This consultation has been prepared in accordance with HM Government consultation principles.¹
8. A draft Regulatory Impact Assessment has not been prepared specifically for the secondary legislation as outlined in paragraph 10 'Regulatory Impact Assessment'.
9. For details about the consultation process (not about the content of this consultation) please contact: [Food Standards Agency Consultation Co-ordinator](#), Room 2B, Aviation House, 125 Kingsway, London, WC2B 6NH. Tel: 020 7276 8140.

¹ <http://www.bis.gov.uk/policies/bre/consultation-guidance>

Comments on the consultation process itself

10. We are interested in what you thought of this consultation and would therefore welcome your general feedback on both the consultation package and overall consultation process. If you would like to help us improve the quality of future consultations, please feel free to share your thoughts with us by using the Consultation Feedback Questionnaire at <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>
11. If you would like to be included on future Food Standards Agency consultations on other topics, please advise us of those subject areas that you might be specifically interested in by using the Consultation Feedback Questionnaire at <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>. The questionnaire can also be used to update us about your existing contact details.

Annex B: Draft Regulatory Impact Assessment

Title: Secondary legislation for the mandatory display of food hygiene ratings online in Northern Ireland	Regulatory Impact Assessment (RIA)		
	Date: 14/03/2017		
	Type of measure: Secondary Legislation		
Lead department or agency: Food Standards Agency	Stage: Consultation		
	Source of intervention: Domestic NI		
Other departments or agencies:	Contact details: Mark O'Neill		
	Food Standards Agency In Northern Ireland		

Summary Intervention and Options

What is the problem under consideration? Why is government intervention necessary? (7 lines maximum)

The Food Hygiene Rating Act (Northern Ireland) 2016 introduces a statutory food hygiene rating scheme in Northern Ireland. The legislation includes provisions which make it mandatory for food businesses to display food hygiene rating stickers at their premises and, if consumers can order online, to display their rating online in a specified manner. Secondary legislation has been implemented to require the display at physical establishments however not online; this will require a separate piece of legislation. This will address a market failure of a lack of information for consumers about hygiene standards of online food businesses. Government intervention is necessary to provide consumers with adequate information enabling them to make informed choices.

What are the policy objectives and the intended effects? (7 lines maximum)

The objective is to introduce secondary legislation that will underpin the online display provision set out in the Food Hygiene Rating Act (Northern Ireland) 2016. This will require food business providing food online by means of an online order facility to display a valid food hygiene rating on said platform. This will act as an important commercial driver for food businesses to maintain and improve compliance with food hygiene law. It will help to provide transparency about hygiene standards and hence drive up food hygiene standards. This will help to reduce consumer risk and increase public health protection.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base) (10 lines maximum)

Option 1 - 'Do nothing': do not introduce online display secondary legislation. This means the primary legislation would be ineffective regarding the online display provision.

Option 2 – Introduce secondary legislation which will ensure the online display provision of the Food Hygiene Rating Act (Northern Ireland) 2016 can be effectively implemented. The Food Hygiene Rating Act (Northern Ireland) 2016 introduces a provision for an online display requirement. Option 2 is the only option that will enable the implementation of the online provision and thus the full implementation of the Act, therefore no other options are being considered. **This is the preferred option**

Will the policy be reviewed? It will be reviewed | **If applicable, set review date:** October 2019

Cost of Preferred (or more likely) Option

Total outlay cost for business £m	Total net cost to business per year £m	Annual cost for implementation by Regulator £m
3.16	0.3	0.0

Does Implementation go beyond minimum EU requirements?

NO YES

Are any of these organisations
in scope?

Micro
Yes No

Small
Yes No

Medium
Yes No

Large
Yes No

The final RIA supporting legislation must be attached to the Explanatory Memorandum and published with it.

Approved by: _____ Date: _____

Summary: Analysis and Evidence

Policy Option 1

Description: **'Do nothing': do not put any secondary legislation or guidance** in place. This means the primary legislation would be ineffective with regards to online display provision.

ECONOMIC ASSESSMENT (Option 1)

Costs (£m)	Total Transitional (Policy) (constant price)	Years	Average Annual (recurring) (excl. transitional) (constant price)	Total Cost (Present Value)
Low	Optional	N/A	Optional	Optional
High	Optional		Optional	Optional
Best Estimate	N/a		N/A	N/A

Description and scale of key monetised costs by 'main affected groups'

There are no costs or benefits associated with this option. This is the baseline against which all other options are appraised.

Other key non-monetised costs by 'main affected groups'

There are no costs or benefits associated with this option. This is the baseline against which all other options are appraised.

Benefits (£m)	Total Transitional (Policy) (constant price)	Years	Average Annual (recurring) (excl. transitional) (constant price)	Total Cost (Present Value)
Low	Optional	N/A	Optional	Optional
High	Optional		Optional	Optional
Best Estimate	N/A		N/A	N/A

Description and scale of key monetised costs by 'main affected groups'

There are no costs or benefits associated with this option. This is the baseline against which all other options are appraised.

Other key non-monetised costs by 'main affected groups'

There are no costs or benefits associated with this option. This is the baseline against which all other options are appraised.

Key Assumptions, Sensitivities, Risks Maximum 5 lines

Costs and benefits in the baseline are constant throughout the lifespan of the policy.

BUSINESS ASSESSMENT (Option 1)

Direct Impact on business (Equivalent Annual) £m		
Costs: n/a	Benefits: n/a	Net: n/a

Cross Border Issues (Option 1)

How does this option compare to other UK regions and to other EU Member States (particularly Republic of Ireland) Maximum 3 lines

The statutory Food Hygiene Rating Scheme in Wales is set out in primary legislation and associated secondary legislation. Voluntary schemes operate in England and Scotland. There is no similar scheme operating in Republic of Ireland.

Summary: Analysis and Evidence

Policy Option 2

Description: Introduce secondary legislation which will underpin the online display provision set out in the Food Hygiene Rating Act (Northern Ireland) 2016.

ECONOMIC ASSESSMENT (Option 2)

Costs (£m)	Total Transitional (Policy)		Average Annual (recurring) (excl. transitional) (constant price)	Total Cost (Present Value)
	2016 (constant price)	10 Years		
Low	0.3		0.0	0.3
High	6.0		0.0	6.0
Best Estimate	3.2		0.0	3.2

Description and scale of key monetised costs by 'main affected groups'

One off costs: **Food businesses:** familiarisation: £15k; Updated online presence: £3.15m; **District Councils:** familiarisation: £1.6k; provision of information on mandatory scheme: £2.2k; **FSA:** increased level of inquiries: £758.

Other key non-monetised costs by 'main affected groups'

There are no non-monetised costs associated with this option

Benefits (£m)	Total Transitional (Policy)		Average Annual (recurring) (excl. transitional) (constant price)	Total Benefits (Present Value)
	(constant price)	Years		
Low	Optional		Optional	Optional
High	Optional		Optional	Optional
Best Estimate	0.0		0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

There are no monetised benefits associated with this option.

Other key non-monetised benefits by 'main affected groups'

Food businesses: Reduced burden of enforcement, growing of market for food premises

Local Authorities: it is envisaged that the proposal will increase compliance levels among FBOs, which in turn reduces the number of inspections LAs need to carry out, hence realising efficiency gains through the reallocation of resources to other areas of food safety concern

Consumers: Improved consumer choice and public health outcomes i.e. reduced risk of contracting foodborne

Key Assumptions, Sensitivities, Risks

- i) As a legal requirement we assume 100% compliance. (ii) Cost of businesses updating online facilities has been calculated using an average in a range of costs obtained from industry. There is a low risk that costs could be significantly higher than estimated (iii) Although, the figure used for number of businesses affected is a conservative estimate, there is a minor risk that actual numbers could be higher, thereby increasing costs above those estimated.

BUSINESS ASSESSMENT (Option 2)

Direct Impact on business (Equivalent Annual) £m		
Costs: 0.6	Benefits: 0.0	Net: - 0.6

Cross Border Issues (Option 2)

How does this option compare to other UK regions and to other EU Member States (particularly Republic of Ireland) Maximum 3 lines

The statutory Food Hygiene Rating Scheme in Wales is set out in primary legislation and associated secondary legislation. Voluntary schemes operate in England and Scotland. There is no similar scheme operating in Republic of Ireland.

EVIDENCE BASE

PROBLEM UNDER CONSIDERATION

As there is an increasing trend for consumers to purchase food online it is important that consumers shopping online are afforded the opportunity whilst shopping online to make an informed choice. The Food Hygiene Rating Act (Northern Ireland) 2016 introduces a statutory food hygiene rating scheme in Northern Ireland. The legislation includes provisions which make it mandatory for food businesses to display food hygiene rating stickers at their premises and, if consumers can order online, to display their rating online in a specified manner. Secondary legislation is needed to give these requirements full effect.

RATIONALE FOR INTERVENTION

1. The Food Hygiene Rating (Northern Ireland) Act 2016 (the Act) introduces a mandatory requirement for food businesses to display food hygiene ratings based on their compliance with food hygiene standards. This provides consumers with information about the hygiene standards in food businesses enabling them to make informed choices about where to eat or shop for food. These choices will potentially incentivise businesses to improve. As such, the scheme is an important commercial driver. It will also provide an effective basis for earned recognition with fewer inspections for compliant businesses and a more sustainable alternative in allowing resources and formal enforcement action to be directed to poorly performing businesses. Improved standards and sustained compliance will increase the scheme's potential to improve public health and contribute to reducing the public health burden of foodborne illness.
2. Without government intervention, the market is likely to underprovide the necessary information. This is because there are positive externalities associated with the increased compliance that this intervention intends to cause. These positive externalities are related to positive health effects of improved compliance due a reduced risk of contracting foodborne illnesses.
3. Secondary legislation is required to underpin the Act and ensure effective implementation of the online display provision.

BACKGROUND

4. The primary legislation for the statutory scheme received Royal Assent on 29 January 2016 and is known as the Food Hygiene Rating Act (Northern Ireland) 2016. Secondary legislation required to allow for the effective implementation of the provisions outlined in the Act was passed by the NI Assembly and came to effect on 7th October 2016.
5. The secondary legislation included provisions setting out the following:

Food Hygiene Rating (Northern Ireland) Regulations 2016	<ul style="list-style-type: none">• the categories of food establishments which are exempt from the rating scheme• the form of the food hygiene rating sticker
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	<ul style="list-style-type: none"> • the location and manner in which the sticker is to be displayed • the information to be provided to new businesses • the form of fixed penalty notices and method of payment
Food Hygiene Rating (Fee and Fixed Penalty Amount) Order (Northern Ireland) 2016	<ul style="list-style-type: none"> • [the fees that will be applicable for requested re-rating inspections • the level of fixed penalty fines • recovery of fees for requested re-rating inspections by District Councils
Food Hygiene Rating (Transitional Provisions) Order (Northern Ireland) 2016	<ul style="list-style-type: none"> • mechanism for transition from the voluntary food hygiene rating scheme currently operated by District Councils in partnership with the Food Standards Agency to the statutory scheme.

6. Further regulations are required in respect of the requirement within the Act for businesses from which consumers can order food online to display their rating in a specified manner. The Food Hygiene Rating (Online Display) Regulations (Northern Ireland) will allow the complete effective implementation of all provisions within the Act.

POLICY OBJECTIVES

7. The objectives are to:
- provide powers through regulations to ensure the effective operation of the statutory food hygiene rating scheme in Northern Ireland with regards to the online display provision.

Description of options

Option 1: ***'Do nothing': do not put any secondary legislation in place***
Without the secondary legislation the provision regarding online display in the Food Hygiene Rating Act (Northern Ireland) 2016 would be ineffective and could not be implemented.

Option 2: **'Introduce secondary legislation'** which will underpin the online display provision set out in the Food Hygiene Rating Act (Northern Ireland) 2016.

These regulations will outline the form of the specified manner of online display that those food business in scope must comply with.

Preferred option

8. **Option 2 is preferred.** This provides the only viable option for achieving the policy objective as it ensure the effective implementation of the online display provision within the Act.

GROUPS AFFECTED

9. The following groups are affected:

Consumers	The primary purpose of the statutory FHRS is to provide information to consumers on the standards of hygiene at food establishments at the point of choice, enabling them to make fully informed choices about where they eat out or shop for food.
Food businesses	The scope of the statutory scheme will potentially affect all those businesses supplying food by means of an online ordering facility direct to consumers. The number of establishments in this group in Northern Ireland is approximately 1,200. ¹
Local authorities	All 11 district councils will be responsible for operating the statutory food hygiene rating scheme and for monitoring compliance of food businesses with the provisions of the Act and associated secondary legislation that relate to them including the online display provision.
FSA	The FSA is responsible for the administration of the statutory scheme and providing resources and operational support to local authorities operating it. The FSA are also producing digital assets which assist businesses in complying with online display requirements.

Cost and Benefits

Option 1 'Do nothing', not to put forth any secondary legislation or guidance'

10. This option is not appropriate as it would be impossible to introduce the online display provision within the Act without the secondary legislation to underpin it. It is considered that there are no cost and no benefits to be gained from this option. This is the baseline option against which alternative options are assessed.

Option 2 'Develop secondary legislation'

11. Currently all of district councils in Northern Ireland are operating the statutory FHRS enforcing each provision within the Act bar online display. The introduction of secondary legislation to underpin this provision would have a nominal impact on costs and benefits as changes to current district council (DC) practice would be almost negligible.

Business Costs

One-off Familiarisation

12. Under Option 2, there would be costs for businesses to read and familiarise themselves with the new online display requirement. The online display requirement would not need to be disseminated to all staff as only certain personal involved in the food businesses online presence would be required to action this requirement. It is estimated, from consultation with industry stakeholders, that familiarisation and dissemination would take 0.5 hours.

13. Familiarisation costs are quantified by multiplying the time it will take for a relevant employee, involved in the businesses online presence, to read the requirements of the

² FSA Open Board Paper: UK local authority food law enforcement 1 April 2011 to 31 March 2012 (<http://www.food.gov.uk/multimedia/pdfs/board/fsa121106.pdf>). The rounded figure includes retailers (4,352) and restaurants/caterers (13883). It does not include businesses outside the intervention programme

online with the wage cost of that employee. We assume that familiarisation will be the responsibility of the manager, and that it will take one manager per business half an hour to familiarise themselves with the requirements of the scheme. We envisage that the cost of disseminating this information to other staff in the business will be negligible.

14. The median hourly wage cost of a production manager is £25.00² multiplying this with the total time required for familiarisation (0.5 hours) results in a cost per business of £12.50. Multiplying this with the total number of businesses in the sector (1,200 results in a total familiarisation cost of £15k.³ (2017 base year, 2016 prices),
15. In order for "one-off" familiarisation costs to be compared on an equivalent basis across policies spanning different time periods, it is necessary to „equivalently annualise“ costs (EAC) using a standard formula.⁴ In line with HMT Green book guidance a discount rate of 3.5% is used. Annualising the total one off familiarisation of £15k (see previous paragraph) yields an EAC of £1.7k in Northern Ireland over 10 years.

Updating online facilities

16. In order to comply with the provision to display a valid rating online, businesses will be required to update their online facility. We provide food establishments food hygiene ratings online as open source data which can be used by any businesses, person, organisation etc. In conjunction with this open source data we are in the process of developing digital assets that will be freely available for businesses to you use. Both of these elements, open source data and digital assets, will greatly reduce the burden to business as it will require minimal technical update to their digital/online platform.
17. It is estimated that 1,200 food businesses will need to update their facilities.⁵ The estimated cost of updating online facilities ranges from £250 up to £5,000, with a best estimate of £2,625. Multiplying the number of food businesses by the cost of updating online facilities leads to a lower estimated cost of £0.3m (with and EAC of £35k) and a higher estimated cost of £6m (with and EAC of £0.7m) with an average value of £3.15m (with an EAC of £0.366m), (2017 base year, 2016 prices).

Transfer in revenue as a result of mandatory display and sector growth

² Wage cost obtained from the ONS Annual Survey of Household Earnings (2016) provisional data set: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashtable1>. The median hourly wage of a production manager (£20.83) has been uprated by 20% to cover overheads: £20.83 * 1.2 = £25.00.

³ 25*0.5*1,200=£15k.

⁴ EACB = PVCB/a_{tr}, Where a_{tr} is the annuity rate given by:

$$a_{t,r} = \sum_{j=0}^{t-1} \prod_{i=0}^j \left(\frac{1}{1+r_i} \right)$$

PVCB is the present value of costs, r is the social discount rate and t is the time period over which the policy is being appraised.

⁵ The number of food businesses within NI with an online ordering facility and therefore in scope of the online display regulations is 1,200. This figure is an estimate based on the combined profiles of a number of aggregators, food delivery companies, the main supermarkets and from discussion with industry stakeholders. This is a conservative estimate which is allowing for a considerable number of food establishments providing online ordering via other platforms (i.e. their own website or social media) and is more likely to be lower than this figure.

18. It is anticipated that mandatory online display of ratings will increase the incentive for food businesses to comply with food hygiene law which in turn will increase consumer confidence in the market. This would help stimulate more competition and boost revenue in the sector. As competition becomes fiercer, there may be a transfer in revenue to businesses with the top rating from those that are not meeting the requirements of food law, so the total impact on industry would be neutral. It is worth highlighting that any gains would be transferred to businesses that comply with food hygiene law.
19. Moreover, it can be expected to encourage growth in the sector as consumers become more confident in purchasing food online.

District Council costs

One-off Familiarisation

20. The introduction of the online display provision of the mandatory scheme would result in familiarisation costs for district councils who need to be aware of the new provision. All food officers in Northern Ireland would need to be aware of the online display provision. As of March 2016, there were approximately 93 full time equivalent EHO posts in Northern Ireland in relation to food safety.
21. Familiarisation costs are quantified by multiplying the wage cost of the relevant official – EHO - with the time spent on familiarisation. It is estimated that it would take an EHO approximately forty five minutes to familiarise themselves with the requirements of the online display provision. The median hourly wage cost of an EHO is £22.76.⁶ Multiplying this with the time spent on familiarisation and the number of EHOs in Northern Ireland generates a total cost of familiarisation to enforcement of £1,588 (2017 base year, 2016 prices).

Informing food businesses

22. We anticipate that there may be an administrative one-off cost to district councils in writing to businesses to inform them about the online display requirement. We envisage that this cost would include, per business, second class postage costs (£0.54) and stationery costs (£0.10). We further assume a small time cost for preparing a letter of around 5 minutes per business. We envisage that it would be local government administrative staff that will be responsible for producing these information packs.
23. The total cost of informing businesses are then calculated as the above time cost plus the postage cost. The time cost is derived by multiplying the wage cost of the administrative staff (£14.78)⁷ with the time required per business and the number of businesses affected, which yields a total time cost of £1.4k⁸. The postage cost is calculated by multiplying the number of businesses by the sum of the postage and stationary costs,

⁶ Wage cost obtained from the ONS Annual Survey of Household Earnings (2016) provisional data set: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashetable1>. The median hourly wage of an „Environmental health officer“ is used, £18.97, plus 20% overheads totalling £22.76.

⁷ Wage cost obtained from the ONS Annual Survey of Household Earnings (2016) provisional data set: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashetable1>. The median hourly wage of „Local government administrative occupations“ is used, £12.32, plus 20% overheads totalling £14.78..

⁸ $12.32 * 1.20 * 0.08 * 1,200 = £1.4k$

which gives a total cost of £768⁹. This results in a total cost of informing businesses of £2.2k. (2017 base year, 2016 prices).

Monitoring compliance

24. District councils would need to monitor and enforce the requirements for food businesses to display their ratings online. We envisage that monitoring could be carried out during routine duties, for example during food hygiene interventions the officer would check to see if the business has an online ordering facility, this would be noted and checked at each planned intervention. The cost of monitoring is therefore considered to be minimal.
25. In cases of non-compliance, district councils would need to take enforcement action against those businesses that fail to display their ratings.

FSA costs

Increased levels of enquiries

26. It is anticipated that the FSA would be required to handle an increased level of enquiries about the online display provision of the scheme from businesses and consumers. FSA staff estimates that an additional 25 hours would be required in the first six months. This administrative cost can be monetised by multiplying the hours required by the wage cost of the official handling these enquiries; which would be a Senior Executive Officer (SEO) in government. The estimated hourly average wage cost of an SEO is £30¹⁰. Multiplying this wage cost with the additional number of hours (25) results in a total one off cost in year one of the policy of £758 (2017 base year, 2016 prices).

Marketing and promotion of the scheme

27. We do not envisage any additional costs of promotion of the scheme under Option 2. Levels of promotion would be the same as currently mandatory scheme.

Informing food businesses

28. We have produced an information leaflet for food businesses which outlines the requirements of the mandatory FHRs. This leaflet was produced for the launch of the mandatory scheme on 7 October 2016 and will have to be updated to reflect the introduction of the online display provision. As this leaflet has already been produced and will only require slight amendment we consider this cost to be negligible.

Benefits

Benefits to food businesses

Growing of market

⁹ $(0.54 + 0.1) * 1,200 = £768$

¹⁰ This is based on information provided by FSA finance: the annual wage cost of an FSA SEO staff member is £53,853. The total hours worked in a year is estimated to be 1,776, which is 37 contractual hours per week multiplied by the weeks worked in year – approximately 48. This equates to an hourly wage cost of £30: £53,853 / 1,776. This does not need to be updated as it is a wage cost rather than a salary and so already includes overheads.

29. Making the display of food hygiene ratings online in a prescribed location and manner mandatory could increase consumer awareness of food hygiene practises in food establishments. This increased transparency could have the effect of growing the market by increasing consumers' confidence in the food industry. Consumers that previously have been hesitant to eat outside of the home due to limited information about food industry hygiene may now feel more comfortable in eating in places where this information is readily available. This is a potential benefit that we have been unable to monetise.

Benefits to Consumers

30. If mandatory display of ratings increases awareness, consumers would realise a benefit in terms of being better able to make informed choices about food they buy online.
31. There is some evidence from the Danish Smiley Scheme that systems with mandatory display may have this impact. The Danish system has been in place since 2001 and an evaluation report in 2007 showed that 100% of consumers were aware of the scheme; 67% would reject a restaurant with a bad rating and 59% already had chosen another restaurant because of an unhappy smiley. This evidence suggests that a system with mandatory display could have positive long term effects on consumer choice. This benefit is very difficult to monetise without further evidence.

Wider benefits

32. If mandatory display leads to improved business compliance, and this in turn leads to a reduction in the number of cases of foodborne illness, there could be a benefit from a reduction in costs associated with such illness.
33. Empirical evidence from the Los Angeles hygiene quality grade scheme showed that mandatory disclosure of hygiene grades resulted in an average increase in inspection scores of 5.3%. The same study also found a statistically significant decrease of 20% in hospitalisations due to foodborne illness.¹¹
34. This evidence suggests that mandatory display could result both in improved compliance and a decline in foodborne illness. This evidence is however specific to the Los Angeles scheme and at this stage we lack similar evidence for the UK. It is our view, however, that we can use the Californian evidence to construct an indicative estimate of benefits arising from the introduction of a statutory scheme in the UK which online display should compound upon further.

Summary of Costs and Benefits under Option 2

35. Table 1 presents a summary of costs and benefits under Option 2. The total cost of Option 2 (mid-point estimate) is £3.15m (the PV is £3.15m when discounted over a period of ten years). The net impact is a discounted net benefit of -£3.15m (present value over ten years). Total cost to business under this option is £3.15m (PV, 10 years); leading to an equivalent net annual cost to business of £0.3m.

¹¹ Jin & Leslie (2003), The effect of information on product quality: evidence from restaurant hygiene grade cards, Quarterly Journal of Economics 118(2) 409-451.

Table 1: Summary of costs and benefits under Option 2

SUMMARY OF TOTAL COSTS			
COSTS	Total	PV	Annual Average/ EAC
Enforcement			
Familiarisation costs	£ 1,588	£ 1,588	£ 184
Informing food businesses	£ 2,187	£ 2,187	£ 254
Total Cost: Local Authorities	£ 3,775	£ 3,775	£ 439
FSA			
Increased level of enquiries	£ 758	£ 758	£ 88
Total Cost: FSA	£ 758	£ 758	£ 88
Total Cost: Enforcement	£ 4,533	£ 4,533	£ 527
Industry			
Familiarisation costs	£ -	£ -	£ -
Updating Online Display (average)	£ 3,150,000	£ 3,150,000	£ 365,952
Updating Online Display (lower)	£ 300,000	£ 300,000	£ 34,853
Updating Online Display (higher)	£ 6,000,000	£ 6,000,000	£ 697,051
Total Cost: Industry (average)	£ 3,150,000	£ 3,150,000	£ 365,952
Lower	£ 300,000	£ 300,000	£ 34,853
Higher	£ 6,004,533	£ 6,004,533	£ 1,063,003
Total Cost (average)	£ 3,150,000	£ 3,150,000	£ 365,952
Upper bound	£ 6,009,066	£ 6,009,066	£ 1,429,482
Lower bound	£ 304,533	£ 304,533	£ 34,853
NET IMPACT			
	Total	PV	EAC
Net Enforcement (Local Authorities and FSA)	-£ 4,533	-£ 4,533	-£ 527
Net Industry (average)	-£ 3,150,000	-£ 3,150,000	-£ 365,952
Upper bound	-£ 300,000	-£ 300,000	-£ 34,853
Lower bound	-£ 6,004,533	-£ 6,004,533	-£ 697,578
Net Consumer	£ -	£ -	£ -
Net Society (average)	-£ 3,154,533	-£ 3,154,533	-£ 366,479
Upper bound	-£ 304,533	-£ 304,533	-£ 35,379
Lower bound	-£ 6,009,066	-£ 6,009,066	-£ 698,105

OTHER IMPACT ASSESSMENTS

Equality impact

Equality screening has been carried out for the purpose of compliance with Section 75 of the Northern Ireland Act 1998.

Having a food hygiene rating displayed at food establishments that can be easily seen by the consumer is an effective way of ensuring that all have equality of access to information. The online display element will enable those using the online platform to order food to make an informed choice.

The mandatory online display provision is not considered to have a significant impact on disability; however, the display and positioning of a food hygiene rating online may impact on those visually impaired. In order to address this, the Act requires that a food business operator must verbally inform a customer of their food hygiene rating if requested.

Through an equality impact screening test, the Agency has considered whether these measures will have any disproportionate impacts on any particular group and on the basis of this exercise has decided that an Equality Impact Assessment is not necessary.

Human rights

The Human Rights Act 1998 has been considered as part of the screening process and the FSA considers that the introduction of a mandatory FHRS is compatible with Convention Rights.

Small Firms Impact Test

The only business costs identified would result from the need for business owners/managers to familiarise themselves with the online display requirement and the need to update their online platforms. The cost of updating the online display requirement will be proportionally larger for small businesses. However, the FSA has provided digital assets, which businesses can utilise freely. The vast majority of businesses within scope will be familiar with the requirements of the statutory FHRS. This will reduce the potential effect on performance as the online display requirement is fundamentally an extension of a duty to display their rating which they should already be complying with.

Competition Assessment

The following four questions have been used to establish the impact of the proposal on competition:

Would the proposal directly limit the number or range of suppliers?

The answer is negative in relation to the introduction of a mandatory online display of ratings.

Would the proposal indirectly limit the number or range of suppliers?

This would occur primarily if the proposal introduced costs of a particular sub-group of firms in the food sector (e.g. small/large firms, new/existing firms, take-aways etc.)

As identified in the cost-benefit analysis section, the costs for businesses arising from putting the FHRS on their online order facilities are thought to be marginal. Increasing access to information on hygiene standards of food businesses could make consumers more confident

about eating out and buying food from new and different businesses and, therefore, allow new entrants to effectively compete in the market.

Would the proposal limit the ability of suppliers to compete?

The key consideration here is whether the proposal would impose “minimum quality standards”.

Minimum hygiene standards imposed by law on food businesses are not affected by the mandatory FHRS and thus online display provision.

Would the proposal reduce suppliers’ incentive to compete vigorously?

The online display provision acts as another source of information enabling the consumer to make an informed choice when purchasing food. Increasing access to information on hygiene standards of food businesses could make consumers more confident about eating out and buying food from new and different businesses and, therefore, allow new entrants to effectively compete in the market.

Rural proofing

The introduction of the mandatory FHRS and thus online display is expected to raise food hygiene standards and increased access to information about food hygiene compliance of food business operators is expected to have a positive impact on tourism in rural areas.

The FSA have screened the policy and concluded that a full impact assessment on rural proofing is not required.

Sustainability

Economic impact

The introduction of the mandatory FHRS scheme and thus online display is expected to increase competitiveness between food businesses as achieving higher ratings will have the potential to increase business and revenue. The desire for higher ratings by food businesses will drive up compliance with food law. The scheme is sustainable in that all food businesses have information on the actions they need to undertake to achieve the highest food hygiene rating under the scheme. The FHRS does not impose any additional requirements that are already imposed by food safety law. There are also safeguard measures in place to ensure that the scheme is transparent and fair to businesses. There are also potential efficiency gains if the scheme leads to an improvement in compliance levels thus freeing up EHO resource to focus on high risk areas: resources will be used more efficiently.

Social impact

Supporting a sustainable society underpins the policy intent for a mandatory FHRS. It addresses both health inequality and access to information by introducing easily accessible hygiene ratings and allowing consumers to make informed choices about where to eat out or buy food. The mandatory scheme is expected to lead to an improvement of food hygiene standards that will help protect the health and the interests of consumers.

Environmental impacts

The FSA considers that the introduction of the online display Regulations to underpin and support the mandatory FHRS will have no impact on environmental sustainability issues.

Legal Aid Impact Test

Through initial discussions with the Department of Justice it is considered that the online display Regulations will not have a significant impact on criminal legal aid. The FSA will continue to work closely with the Department of Justice to assess any impact.

Annex C: Draft Regulations

Order laid before the Assembly under section 7(3) of the Food Hygiene Rating Act (Northern Ireland) 2016, and subject to affirmative resolution procedure of the Assembly

STATUTORY RULES OF NORTHERN IRELAND

2017 No.

FOOD

The Food Hygiene Rating (Online Display) Regulations (Northern Ireland) 2017

Made - - - - - ***

Affirmed by resolution of the Assembly on ***

Coming into operation - *In accordance with article 1(1)*

The Department of Health,^(a) makes the following Regulations in exercise of the powers conferred by section 7(3) and (4) of the Food Hygiene Rating Act (Northern Ireland) 2016^(b).

Citation commencement and interpretation

1. (1) These Regulations may be cited as the Food Hygiene Rating (Online Display) Regulations (Northern Ireland) 2016 and comes into operation forthwith.

(2) A “specified online facility” means a website or an application by which an order for food can be placed online and a social media site inviting consumers to place an order for food online.

Online provision of Food Hygiene Rating

2. Subject to the exception in regulation 3, the operator of a food business establishment supplying consumers with food ordered using a specified online facility must-

- (a) display an icon representing the valid food hygiene rating for that establishment where it can be readily seen and easily read at the point food can be selected to order; and
- (b) where the specified online facility relates to more than one food business establishment that facility must also display that icon at any point the food business establishment can be selected.

(a) Formerly the Department of Health Social Services and Public Safety; see 2016 c.5 (N.I.), section 1
(b) 2016 c.3

Multiple establishments with a single operator

3. (1) Where the operator of a number of food business establishments-

(a) supplies consumers with food ordered using a specified online facility relating only to food business establishments under the control of that operator; and

(b) the specified online facility does not identify which of those establishments will supply the consumer;

that operator must display an icon providing a link to a list of valid food hygiene ratings identifying the food business establishment to which it relates for any establishment which may supply the order.

(2) The icon must be readily seen and easily read at the point food can be selected to order from that food business establishment.

Time for publication of rating online

4. The operator of a food business establishment supplying food by way of a specified online facility must display that rating in accordance with regulation 2 or 3 as appropriate within 28 days of the date on which the food hygiene rating for that establishment is published online by the Food Standards Agency as required by the Food Hygiene Rating Act (Northern Ireland) 2016

Sealed with the official seal of the Department of Health, on 0th Month 20XX.



Name
A senior officer of the Department of Health.

Annex D: Consultation response form

**FOOD STANDARDS AGENCY CONSULTATION
Impact of mandatory display of food hygiene ratings in Northern Ireland
CONSULTATION RESPONSE FORM**

Please return this response by 14 July 2017 to:

By email: Hannah McCartney executive.support@foodstandards.gsi.gov.uk

By post: Local Authority Policy and Delivery Team, Food Standards Agency in Northern Ireland, 10A-10C Clarendon Road, Belfast BT1 3BG

Your name:	
Your organisation or businesses (if appropriate):	
Your postal address:	
Your email address:	
Your telephone number:	

PROPOSALS FOR THE DRAFT FOOD HYGIENE RATING (ONLINE DISPLAY) REGULATIONS (NORTHERN IRELAND) 2016

Question 1- Do you agree with the proposed commencement date which will be immediately following the legislative process? If you consider an alternative date appropriate please specify this and provide a rationale.

Answer

(The box will expand as you type)

Question 2 - Do you have any comments regarding the definition of a “specified online facility” which will bring certain businesses within scope of this requirement? If you think that this definition has included or excluded certain business in the scheme that should or should not be, please provide details and a rationale of why they should be included or excluded.

Answer

(The box will expand as you type)

Question 3 - Do you have any comments on Regulation 2 regarding the location and manner of display of food hygiene rating icon?

Answer

(The box will expand as you type)

Question 4 - Do you have any comments on Regulation 2 regarding the identifying of the food businesses establishment to which the food hygiene rating icon relates?

Answer

(The box will expand as you type)

Question 5 - Do you have any comments regarding Regulation 3?

Answer

(The box will expand as you type)

Question 6 - Do you agree with the proposed specified time period for publication, If not please state why and provide a rationale for an alternative period.

Answer

(The box will expand as you type)

Question 7 – Do you have any comments or views on the design and usage of the draft icons/badges.

Answer

(The box will expand as you type)

Question 8 - Do you have any other comments or views on the draft Regulations described in this document?

Answer

(The box will expand as you type)

Annex E: Interested parties list

Alliance Party – Policy Officer
Altnagelvin Area Hospital
Antrim and Newtownabbey Borough Council
Antrim Area Hospital
Apache Pizza
Aramark
Ards and North Down Borough Council
Armagh City, Banbridge and Craigavon Borough Council
Asda
Asia Supermarket
Asia Supermarket
Amazon (Via Primary Authority Newham Council)
Ballygally Castle Hotel
Ballymena Chamber of Commerce
Bangor Chamber of Commerce
Belfast Chamber of Commerce
Belfast City Council
Belfast Health & Social Care Trust
Belfast Metropolitan College
Belfast Trust
Belvoir Park Hospital
Big Al's Pizza and Smokehouse
Botanic Inns
Bumbles Delicatessen Ltd
Burger King
Burren Balsamics Vinegars
Caffe Nero
CAFRE
Cakes by Suzanne
Camseng Oriental Food Suppliers
Carols Stock Market
Causeway Coast and Glens Borough Council
Causeway Hospital
Chartered Institute of Environmental Health
Chinese Chamber of Commerce
Coleraine Hospital
Compass
Consumer Council for Northern Ireland
Co-operative
Costa Coffee
Costcutter
Curleys Supermarkets Ltd
Da Nanos
Daisy Hill Hospital
Deliveroo
Department of Agriculture and Rural Development
Department of Enterprise Trade and Investment
Department of Health, Social Services and Public Safety
Department of Justice
Derry Chamber of Commerce
Derry City and Strabane District Council
Domino's Pizza Group plc
Donegal Rapeseed Co
Down Lisburn sector, South Eastern Trust
Dunnes Stores Limited
DUP – Policy Officer
Europa Hotel
Facebook
Federation for Small Business
Federation of Small Businesses
Federation of Women's Institutes of NI
Fermanagh and Omagh District Council
Fitzwilliam Hotel
Forever Living
Foster Green Hospital
Frankie and Benny's
Galgorm Group
Galgorm Group
Gaze
General Consumer Council for Northern Ireland
Gourmet
Harry Ramsden's
Hilton Hotels
Holiday Inn Belfast
Holiday Inn Express
Hospital Caterers Association, NI Branch
Hotel Services Department Erne Hospital
Hungryhouse
I Love Fudge
Just-Eat
Ibis Hotel - City Centre Hotel
Ibis Hotel, Queen's Quarter
Indian Ocean Group
John Henderson Group
Kentucky Fried Chicken
Kylemore Foods Group Ltd
Lidl Supermarket
Lisburn and Castlereagh City Council
Lisburn Chamber of Commerce
Mackle Apples
Marks & Spencer
Mater Hospital Trust
Maud's Ice Cream
McAtamney Butchers
McDonalds
Merchant Hotel/Little Wing
Mid and East Antrim Borough Council
Mid Ulster Council

Mid Ulster Hospital
Mount Charles Catering Limited
Musgrave Retail Partners NI
Musgrave Supervalu Centra
Nando's
Newry Chamber of Commerce
Newry, Mourne and Down District Council
NI Cooks & Chefs Association
NI Good Food
NI Tourist Board
North of Ireland Wholesale Confectioners Association
North West Regional College
Northern Health and Social Care Trust
Northern Ireland Amusement Caterer's Trade Association
Northern Ireland Chamber of Commerce
Northern Ireland Food and Drink Association
Northern Ireland Hotels Federation
Northern Ireland Independent Retail Trade Association
Northern Ireland Local Government Association
Northern Ireland Master Butchers Association
Northern Ireland Retail Consortium
Northern Regional College
OFMDFM
O'Kane Food Services
Omagh Chamber of Commerce
Paolo's Pizza
Patient Experience Manager, catering
Pizza Express
Pizza Hut
Premier Inn
Premier Inn
Pubs of Ulster
Radisson Blu Hotel
Ramada Plaza Belfast
Red Panda Restaurants Belfast
Restaurateurs Association
RNIB
Romeos
Royal Belfast Hospital for Sick Children
Royal Victoria Hospital
Sainsbury's Supermarket
SDLP – Policy Officer
Shah Jalal
Shantallow Health Centre
Shapeshifter Nutrition
Sinn Féin – Policy Officer
Sodexo
South Eastern Regional College
South Eastern Trust
South West Regional College
Southern Health and Social Care Trust
Southern Regional College
Southern Trust Craigavon Hospital
Starbucks Coffee
Subway
Tamnagh Foods
Tesco
The Chalet
The New You Plan
The Streat
Tyrone County Hospital
Ulster Hospital
UUP – Policy Officer
Western Health and Social Services Board
Wetherspoon
Wheelers

FHRS consultation: Annex: F

Draft FHRS online display icons/badges

We have developed a range of Food Hygiene Ratings Scheme icons/badges to help you display your food hygiene rating online. They can be used to display your rating on your digital services, including on websites, apps, social media and emails.

There are four icons/badge options to display your rating:

Impact badge: Use this badge to emphasize the food hygiene rating. Should be displayed at the point food can be selected to order'. It can also be displayed on the homepage or other pages.

Simple two-line badge: Use this alternative badge to provide your food hygiene rating. Should be displayed at the point food can be selected to order'. It can also be displayed on the homepage or other pages.

Preview badge: Use this badge when listing more than one outlet or business on a page. E.g. listing multiple restaurants.

Plain text (Unicode): Only use this badge when it is not possible to show any of the other badges above.

We would like to you to try these badges and let us know what you think.

Please download the draft icons/badges from our Dropbox link here and try them out on your digital services.

https://www.dropbox.com/sh/sggtvh8csqfy52d/AABes_P8EcP1sy0rhmQRQGpDa?dl=0

(Note: the Plain text (Unicode) icons/badges can simply be copied from the examples below.)

Please send your comments on the design and usage of the draft icons/badges as part of your response to the consultation.

We are also developing a service that will allow businesses to embed these icons/badges into digital services using a small piece of code. The code will use underlying data to automatically update the rating displayed on your site. Please note: the draft icons/badges you download here will **not** update automatically.

Food Hygiene Rating 5

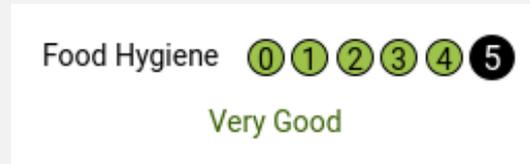
Download badges with FHR ratings of 5:

<https://www.dropbox.com/sh/dvjet7m4gowmawc/AAA7rcRyevB58DF1d5OoqGcfa?dl=0>

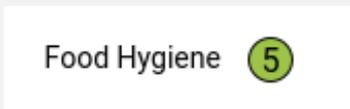
Impact badge



Simple two-line badge



Preview badge



Plain text (Unicode)

Food Hygiene: ●●●●● (5/5) Very good

Food Hygiene Rating 4

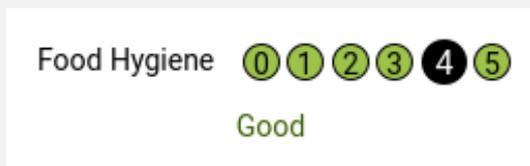
Download badges with FHR ratings of 4:

<https://www.dropbox.com/sh/nvhy4zlnasf34/AABOeFhWI5sTbJNxo3lcpjb9a?dl=0>

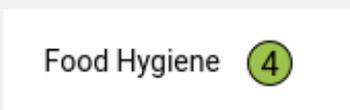
Impact badge



Simple two-line badge



Preview badge



Plain text (Unicode)

Food Hygiene: ●●●●○ (4/5) Good

Food Hygiene Rating 3

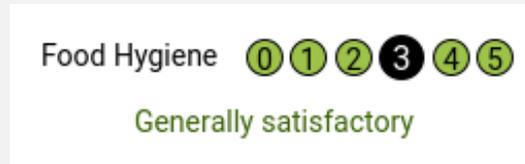
Download badges with FHSR ratings of 3:

https://www.dropbox.com/sh/vi6cxioia90f1mk/AADD3DhAabnQsW8mhfSu_Ztba?dl=0

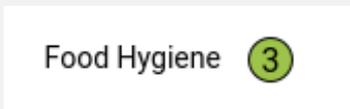
Impact badge



Simple two-line badge



Preview badge



Plain text (Unicode)

Food Hygiene: ●●●○○ (3/5) Generally satisfactory

Food Hygiene Rating 2

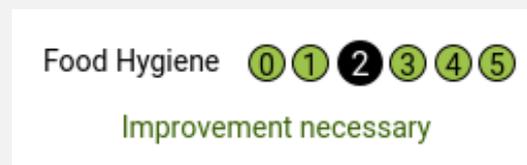
Download badges with FHSR ratings of 2:

<https://www.dropbox.com/sh/mc6qza0wj0lyt7n/AABgi8cLhJgF7BOWB4k032Fda?dl=0>

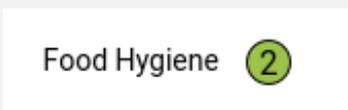
Impact badge



Simple two-line badge



Preview badge



Plain text (Unicode)

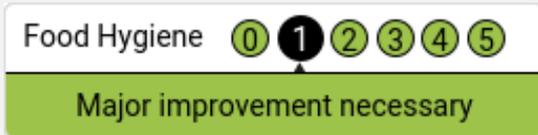
Food Hygiene: ●●○○○ (2/5) Improvement necessary

Food Hygiene Rating 1

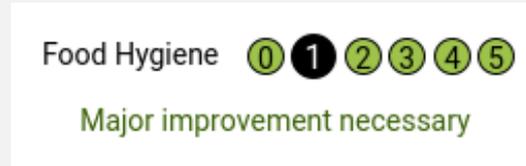
Download badges with FHSR ratings of 1:

https://www.dropbox.com/sh/ezw99743wygh8z3/AACjeYRAC8IPM05fXZHhT_O9a?dl=0

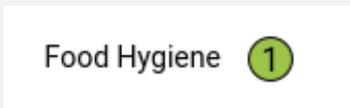
Impact badge



Simple two-line badge



Preview badge



Plain text (Unicode)

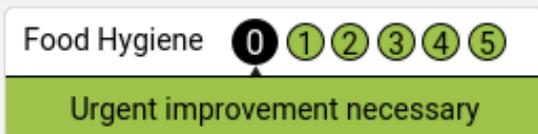
Food Hygiene: ●○○○○ (1/5) Major improvement necessary

Food Hygiene Rating 0

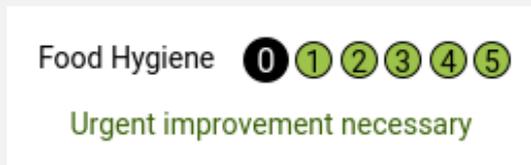
Download badges with FHSR ratings of 0:

https://www.dropbox.com/sh/9b6543tevfhpt5g/AABQMcgUcLSLuHav7_89ZiRJa?dl=0

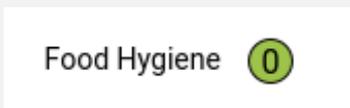
Impact badge



Simple two-line badge



Preview badge



Plain text (Unicode)

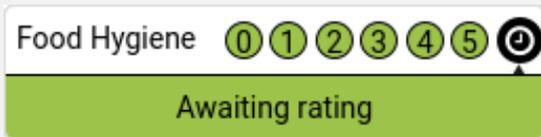
Food Hygiene: ○○○○○ (0/5) Urgent improvement necessary

Food Hygiene Rating: Awaiting rating

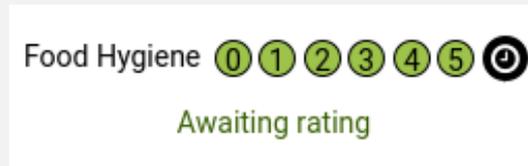
Download badges with FHRs Awaiting rating

<https://www.dropbox.com/sh/f43lwo4fn31mjcq/AAAWSSP7POoBnFTfXgd3Wwsga?dl=0>

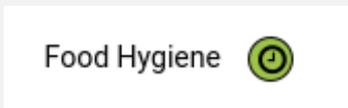
Impact badge



Simple two-line badge



Preview badge



Plain text (Unicode)

Food Hygiene: ⚠ Pending