

30 March 2016

For the attention of the Food Standards Agency

The safe production of beef burgers in catering establishments: interim advice for LA officers and food business operators

Thank you for considering our previous points and amending in this latest consolidated advice on the production of rare burgers.

We are writing as the BHA maintains that one of the biggest issues which is, as yet, unresolved, that the FSA states that the draft guidance refers to Consumer Advisory Notices being required or as “best practice”.

The BHA is of the opinion that if food is safe for consumption, then a notice is not needed and it is not the position of business to educate the consumer on what or how they cook at home.

Furthermore, we believe that it should not be mandatory to provide such a notice in any circumstances to advise consumers in “vulnerable groups”. We do not believe that in consideration of whether food is safe regard should be had to information provided to consumers in vulnerable groups. We do not think this is the intention of Article 14 (3) and (4) because this law relates to a “specific category of consumers” who may have a “health sensitivity and thus must avoid “particular food” because of “specific adverse health effects. “The term “vulnerable group” is too wide to fit into this category and the potential illness from enteric diseases is not a “health sensitivity”.

As a middle ground, the BHA would like to propose an alternative where the FSA provides businesses with a QR code at the point of sale which, if used, would take customers to the FSA website where messages or information would be readily available. QR codes could also be provided to businesses as a sticker so menus would not need to be reprinted. We recommend the message with the QR code reads “to find out more about the safe cooking of food in the home please scan the code”. The advantage of this system would be that this would allow the FSA to make changes to their website consumer advice without any impact or burden on business.

The BHA believes that this initiative would satisfy the aims and objectives of the FSA to get the message out to consumers without creating a burden on business.