Infrastructure and Environment

# Consultation – Draft Food (Jersey) Regulations 202-

## Feedback Summary

# Introduction

The Minister for the Environment is grateful to everyone who gave of their time and responded to the consultation on the Draft Food (Jersey) Regulations 202-. The answers to the questionnaire and the feedback provided will help shape the draft Regulations as we move forward. The intention is to lodge them in December for debate in the States Assembly early in 2026. If adopted, the package of laws would likely come into effect in 2026.

By way of context, in December 2022, the States Assembly passed the Food (Jersey) Law 2023. Once enacted, this law will replace the Food Safety (Jersey) Law 1966, modernising the regulation of food in Jersey to better protect human health and consumer interests.

As is standard practice, the new law identified several areas where secondary (or subordinate) legislation is required to bring its provisions into effect. During the Assembly debate that passed the primary Food law, a commitment was made by the then Minister for the Environment, supported by the current Minister, to consult on these draft subordinate regulations.

In addition to introducing new elements, such as detailed requirements for food allergen labelling and proposals for a new licensing scheme, the intention is to consolidate existing regulations, particularly those relating to food hygiene, into a single, streamlined set of regulations. This will allow several outdated laws to be repealed, creating a clearer and more accessible legal framework.

The consultation ran over a ten-week period, from 31 July 2025 to 9 October 2025. A copy of the consultation paper, which included commentary and questions alongside the draft regulations, can be viewed via the 'Closed Consultations' section of the gov.je website.

Members of the public were able to download the consultation from the gov.je website, with hard copies available on request. The questions were included at the end of each section and were also available in a separate document for electronic submission via an online survey link.

E-mails alerting recipients to the consultation were sent to all food businesses registered with the Environment Department. We also reached out to trade and industry bodies and other stakeholders to encourage participation. In addition, a cross-section of food businesses was invited to three pre-consultation events designed to raise awareness of the consultation, highlight its content, and encourage completion of the questionnaire.

**Number of responses**

A total of 129 responses were received:

- 53 from food businesses
- 6 from representative bodies or professional organisations
- 59 from members of the public
- 11 respondents did not specify their background

Respondents did not necessarily answer every question. The number of responses from members of the public and food businesses was almost the same which is particularly welcome.

The responses to the consultation questions form the body of this document. In the commentary accompanying each question, the overall response is broken down further to say how food businesses and members of the public responded.

## Summary of responses

Across the consultation, the responses generally indicated strong support for the department's proposals and draft regulations:

**Food allergen labelling:**
There was overwhelming support for introducing legal requirements for food allergen labelling in Jersey, across both food businesses and members of the public.

**Labelling approach:**
A majority of respondents agreed that the overall approach proposed to labelling and allergens struck the right balance between protecting consumers and being practical for food businesses.

**Food hygiene legislation:**
There was overwhelming support for updating and consolidating existing food hygiene legislation into a single set of regulations.

**Licensing scheme:**
A majority of respondents supported introducing a new licensing scheme for food businesses. Over half agreed that licensing should replace the current food registration system to better reflect the importance of food safety compliance. There was also recognition that a single, streamlined licensing process would reduce the administrative burden for businesses.

**Risk-based licensing and fees:**
Support was less clear for a risk-based approach to licensing, where higher-risk businesses would face more oversight and higher fees. Fewer than half of respondents supported the idea. While around half of the members of the public who responded were generally supportive, food businesses were not – albeit by a narrow margin.

Around a quarter of respondents believed the proposed fee levels (£200/£350/£500) were fair and proportionate, while 40 per cent did not. Around two-thirds of food businesses were not supportive. Members of the public showed more support, but the highest proportion was unsure.

## Next steps

In light of the responses, the Minister intends to proceed with the proposals and the draft regulations but will give particular consideration to:

- The arrangements for licensing food businesses
- The appropriateness of applying a fee (as permitted in the primary law), including how fees might be structured and what rates should be set, if at all.

## General feedback

Many respondents provided general feedback on the proposals. These comments have been reproduced verbatim, with only names and references to specific businesses removed. These omissions do not affect the substance of the comments received.

The feedback was wide-ranging and often included opposing views. Several comments raised specific questions about how the law will operate. Where appropriate, these will be considered when finalising the regulations and preparing guidance, which will ultimately be published on the gov.je website. This guidance is intended to include links to useful resources, such as those from the UK Food Standards Agency, which has supported similar legislation and provides particularly helpful materials for food businesses, alongside a series of informative questions and answers.

## Balancing priorities

In moving forward with the draft regulations, the Minister reiterates the aim of striking a balance between:

- Protecting public health, recognising that, in the most serious cases, unsafe food can cause illness or death
- Avoiding unnecessary burdens on food businesses that could limit the variety and availability of food.

The approach will combine law and guidance. The tone is intended to be supportive, encouraging businesses to demonstrate a duty of care to their customers while continuously improving and maintaining high standards. The goal of the Regulation Directorate remains to provide effective oversight without being burdensome, adopting a light-touch approach where possible, but always with public health as the priority.

# Summary:

## Section A: Food Standards, including Labelling and Food Allergens

| 1. Please indicate the capacity in which you are responding to this consultation. This helps the Directorate understand the perspective behind each response and ensures that feedback is considered appropriately. | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | As a food business | | 44.92% | 53 |
| 2 | As a representative body/professional organisation | | 5.08% | 6 |
| 3 | As a member of the public | | 50.00% | 59 |
| | | | answered | 118 |
| | | | skipped | 11 |

### Summary Q1:

Of the 118 respondents who indicated their background, exactly half were members of the public, 45 per cent were food businesses and the remaining five per cent classed themselves as a representative body or a professional organisation. Another 11 respondents did not answer this question.

Please note that question 2 asked those who selected 'representative body/professional organisation' to specify the organisation and their role. Unfortunately, many more than the six respondents who identified themselves as in this category replied, some doing so with the names of their food businesses, so we have not analysed this question. As an aside, of those that did give their role, the majority said they were directors or owners of a business.

| 3. Do you support the introduction of legal requirements for food allergen labelling in Jersey? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 88.52% | 108 |
| 2 | No | | 6.56% | 8 |
| 3 | Not sure | | 4.92% | 6 |
| | | | answered | 122 |

| 3. Do you support the introduction of legal requirements for food allergen labelling in Jersey? | | |
|---|---|---|
| | skipped | 7 |

## Summary Q3:

Nearly nine in ten respondents supported the introduction of legal requirements for food allergen labelling in Jersey. Only eight respondents said they were not supportive and this was equally divided between food businesses and members of the public. 40 of the 53 food businesses were supportive, as were 51 of the 59 members of the public.

| 4. Do you agree that food businesses should be required to provide food allergen information for non-pre-packed (loose) food? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Strongly agree | | 48.36% | 59 |
| 2 | Agree | | 31.97% | 39 |
| 3 | Neutral | | 8.20% | 10 |
| 4 | Disagree | | 8.20% | 10 |
| 5 | Strongly disagree | | 3.28% | 4 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q4:

Over 80 per cent of respondents 'strongly agreed/agreed' that food businesses should be required to provide food allergen information for non-pre-packed loose foods. Non-pre-packed foods includes foods served in cafes and restaurants. Among food businesses, there was strong support, with 40 of the 53 respondents 'strongly agreeing/ agreeing'. Nine 'strongly disagreed/disagreed'. 51 of the 59 members of the public who responded 'strongly agreed/agreed', while five 'strongly disagreed/disagreed'.

| 5. How should food allergen information for non-pre-packed food ideally be provided? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | In writing only | | 34.71% | 42 |
| 2 | Verbally only | | 8.26% | 10 |
| 3 | In writing, supported by verbal explanation | | 45.45% | 55 |
| 4 | No preference | | 11.57% | 14 |
| | | | answered | 121 |
| | | | skipped | 8 |

## Summary Q5:

The UK Food Standards Agency has recently updated its guidance to food businesses following research it undertook on how the UK public preferred allergen information to be presented. In light of this, it suggested that allergen information should be in writing, supported by a verbal explanation if desired.

Respondents to this survey supported this approach, but it was not an outright majority with 45 per cent backing this 'twin track' approach. Around 34 per cent suggested that information in writing only would suffice. Members of the public clearly supported information in writing, supported by a verbal explanation (33); 20 of the 59 respondents were content with information available only in writing. A narrow majority of food businesses suggested that 'in writing only' was preferable, with 18 supporting the twin-track writing/verbal explanation approach. Of the ten respondents who suggested verbally only, eight of those were food businesses.

| 6. Do you support the requirement for Pre-Packed for Direct Sale (PPDS) food to include a full ingredients list with food allergens emphasised? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 84.30% | 102 |
| 2 | No | | 7.44% | 9 |
| 3 | Not sure | | 8.26% | 10 |
| | | | answered | 121 |
| | | | skipped | 8 |

## Summary Q6:

84% of respondents agreed that there should be an ingredient list/allergens emphasised on PPDS food (eg sandwiches made on the premises). 42 of the 52 food businesses responding to this question supported the requirement, while 53 of 59 members of the public did so.

| 7. Recognising that some small food businesses may be affected for the first time by the requirement to provide written food allergen labelling on PPDS foods (e.g. sandwiches made and packed on-site), a one-year grace period is proposed before the rule becomes mandatory. Do you think this grace period is appropriate? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 45.90% | 56 |
| 2 | No | | 45.90% | 56 |
| 3 | Not sure | | 8.20% | 10 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q7:

While there was very high support for placing allergy information on PPDS food, there was some difference of opinion on how long businesses should be given to do this. We are proposing a one-

year grace period for businesses to provide the required information. There was an equal split between those agreeing with this time period and those not (45% for each).

36 of the 53 food businesses responding were content with a year's grace; 15 were not. A much higher proportion of the responses from the public were not content with the one-year suggestion – 40 of the 59 responses.

| 8. If 'No' to Q7, how long do you think the grace period should be? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | No grace period | | 24.66% | 18 |
| 2 | 6 months | | 42.47% | 31 |
| 3 | 18 months | | 6.85% | 5 |
| 4 | 2 years | | 20.55% | 15 |
| 5 | Other | | 5.48% | 4 |
| | | | answered | 73 |
| | | | skipped | 56 |

## Summary Q8:

Of those disagreeing with a year's grace for information on allergies to be provided on PPDS food packaging, a quarter said there should be no grace period, 42% said it should be six months and around a quarter suggested 18 months or two years. Overall, of those disagreeing, 49 of the 73 were looking to six months or less, while 20 sought a grace period of 18 months to two years. Members of the public were strong supporters of six months (22) or no grace period (15), while the 23 food businesses favoured two years or six months.

| 9. Do you agree that food allergen information should be provided at both the point of ordering and delivery for food sold online or by phone? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Strongly agree | | 36.07% | 44 |
| 2 | Agree | | 23.77% | 29 |
| 3 | Neutral | | 20.49% | 25 |
| 4 | Disagree | | 16.39% | 20 |
| 5 | Strongly disagree | | 3.28% | 4 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q9:

This question was particularly directed at food being ordered for home delivery. While 60 per cent of respondents 'strongly agreed/agreed' that allergen information should be provided

at both the point of sale and delivery, 16 per cent disagreed and over 20 per cent were neutral. Food businesses were more evenly split, with 23 'strongly agreeing/agreeing' and 15 'strongly disagreeing/disagreeing'. Members of the public were much more supportive, with the figures being 43 and 9 (of 59 respondents) respectively.

10. Do you agree that food allergen information must always be available in English before any food purchase?

| Answer Choices | | Response Percent | Response Total |
|---|---|---|---|
| 1 | Strongly agree | 56.56% | 69 |
| 2 | Agree | 29.51% | 36 |
| 3 | Neutral | 9.02% | 11 |
| 4 | Disagree | 4.10% | 5 |
| 5 | Strongly Agree | 0.82% | 1 |
| | | answered | 122 |
| | | skipped | 7 |

## Summary Q10:

Approaching 90% of respondents 'strongly agreed/agreed' that food allergen information must always be available in English before the food is purchased, with over 56 per cent 'strongly agreeing'. Members of the public were more supportive with 56 (of 59) respondents 'strongly agreeing/agreeing'. The respective figure for food businesses was 41 (of 53).

11. Food prepared by private individuals for one-off charity or cultural events (e.g. cake sales or Lunar New Year celebrations) would not be required to meet formal labelling rules. However, individuals would be encouraged to list known ingredients, provide accurate food allergen information, and follow good hygiene and safety practices. Do you agree with this approach?

| Answer Choices | | Response Percent | Response Total |
|---|---|---|---|
| 1 | Yes | 72.13% | 88 |
| 2 | No | 19.67% | 24 |
| 3 | Not sure | 8.20% | 10 |
| | | answered | 122 |
| | | skipped | 7 |

## Summary Q11:

Nearly three quarters of respondents agreed that one-off charity/cultural events (eg cake sales or Lunar New Year celebrations) would not be required to meet formal labelling rules. Broadly similar proportions (70 per cent/20 per cent) of members of the public and food businesses agreed/ disagreed with this pragmatic approach.

| 12. Other than for food allergies, food labelling can be in a language that is readily understood by the customer. For example, a shop selling food imported from Portugal predominantly to the Portuguese community can label its food in Portuguese. Would this be acceptable? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 54.10% | 66 |
| 2 | No | | 32.79% | 40 |
| 3 | Not sure | | 13.11% | 16 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q12:

Over half of respondents were accepting of the proposal that, other than for food allergies, food labelling can be in a language understood by the customer – for example a shop selling food imported from Portugal predominantly to the Portuguese community can label its food in Portuguese. A sizeable minority – a third of all respondents – were not accepting of the proposal. Food businesses were less accepting of the proposal (with 26 accepting and 20 not) than members of the public, where the respective figures were 33 for and 18 against.

| 13. We are proposing that food sold at a 'temporary international market' (e.g. the Norman Market), licensed by the Bailiff, be exempt from the requirement to provide labelling in English. However, traders would still be expected to respond to ingredient and food allergen queries, or provide a printed explanation. Would this be acceptable? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 61.48% | 75 |
| 2 | No | | 25.41% | 31 |
| 3 | Not sure | | 13.11% | 16 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q13:

Over 60 per cent of respondents supported the proposal that food sold at a 'temporary international market' (eg the Norman market) licensed by the Bailiff should be exempt from the requirement to provide labelling in English (but would be subject to the proviso that they would still be expected to respond to ingredient and food allergy enquiries or provide a printed explanation). Members of the public were more supportive of this approach than food businesses, with 41 supportive and 12 not (of 59); among food businesses, the figures were 29 –18 in support (of 53).

| 14. In line with UK and EU law, nutrition labelling would be required on certain food packaging. However, this would apply only to local manufacturers exporting off-Island, not to those selling solely within Jersey. Small businesses would be exempt. Are you supportive of this approach? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 54.55% | 66 |
| 2 | No | | 26.45% | 32 |
| 3 | Not sure | | 19.01% | 23 |
| | | | answered | 121 |
| | | | skipped | 8 |

## Summary Q14:

Over 50 per cent of respondents supported the provision of nutrition labelling in the circumstances set out above. Members of the public were less supportive than food businesses. While members of the public were almost equally split 23-22 in favour, food businesses were much more supportive of the approach outlined, by 38 to 7.

| 15. We are considering a requirement to include Quantitative Ingredient Declarations (QUID) labelling for meat content in 'Pre-packed for Direct Sale' (PPDS) food (such as stating 'pork (80%)' on a sausage roll). Does this place an excessive burden on small businesses, particularly in Jersey? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 45.08% | 55 |
| 2 | No | | 31.97% | 39 |
| 3 | Not sure | | 22.95% | 28 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q15:

There was some criticism of this question as it was observed that, as originally phrased, it was unclear what was being asked. Therefore, the question was amended early on. Some 45 per cent of respondents thought that QUID labelling would place a burden on small businesses. Almost twice as many food businesses thought it would prove a burden as not; among the public, the response was more even, with more saying it was not a burden (23-20). Some 28 respondents overall were not sure.

| 16. Do you think the overall approach to labelling and food allergens strikes the right balance between protecting consumers and being practical for food businesses? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 63.11% | 77 |
| 2 | No | | 16.39% | 20 |
| 3 | Not sure | | 20.49% | 25 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q16:

Over 60% of respondents thought that the overall approach proposed to labelling and food allergies is striking the right balance between protecting consumers and being practical for food businesses (20% not sure; 16% disagreed). 38 of 59 members of the public agreed, as did 32 of 53 food businesses.

| 17. Do you support the proposal to update and consolidate existing food hygiene legislation into a single set of regulations? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 87.70% | 107 |
| 2 | No | | 0.82% | 1 |
| 3 | Not sure | | 11.48% | 14 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q17:

Almost 90% of respondents supported proposals to update and consolidate existing food hygiene legislation into a single set of regulations. Only one respondent, a member of the public, did not support the consolidation.

| 18. How confident are you that your current food hygiene practices observed meet the standards proposed in the new regulations? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Very confident | | 31.15% | 38 |
| 2 | Somewhat confident | | 31.97% | 39 |
| 3 | Not very confident | | 4.10% | 5 |
| 4 | Not confident at all | | 5.74% | 7 |
| 5 | Not applicable | | 27.05% | 33 |
| | | | answered | 122 |

| 18. How confident are you that your current food hygiene practices observed meet the standards proposed in the new regulations? | | |
|---|---|---|
| | skipped | 7 |

## Summary Q18:

This question was particularly targeted at food businesses and all bar one of the 52 food businesses were 'very' or 'somewhat confident'. Of the 30 members of the public that responded, 19 were 'very' or 'somewhat confident', and 11 'not very' or 'not confident'.

| 19. Do you agree that food safety should be the responsibility of all employees, not just management? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Strongly agree | | 71.90% | 87 |
| 2 | Agree | | 20.66% | 25 |
| 3 | Neutral | | 6.61% | 8 |
| 4 | Disagree | | 0.00% | 0 |
| 5 | Strongly disagree | | 0.83% | 1 |
| | | | answered | 121 |
| | | | skipped | 8 |

## Summary Q19:

Over 90% of respondents agreed that food safety should be the responsibility of all employees, not just management. Only three of the 52 food businesses replying to this question did not agree with this sentiment and remained neutral. Members of the public showed similar levels of support.

| 20. Do you agree with the requirement for food handlers to be trained in food hygiene, including allergen awareness and cross-contamination risks? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Strongly agree | | 74.38% | 90 |
| 2 | Agree | | 20.66% | 25 |
| 3 | Neutral | | 4.96% | 6 |
| 4 | Disagree | | 0.00% | 0 |
| 5 | Strongly disagree | | 0.00% | 0 |
| | | | answered | 121 |
| | | | skipped | 8 |

## Summary Q20:

Over 95 per cent of respondents agreed with this requirement. No one disagreed, with members of the public particularly exhibiting 'strong agreement'.

| 21. Do you support the inclusion of specific hygiene requirements for primary production (e.g. handling of milk, fish, and meat products)? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 83.33% | 100 |
| 2 | No | | 5.00% | 6 |
| 3 | Not sure | | 11.67% | 14 |
| | | | answered | 120 |
| | | | skipped | 9 |

## Summary Q21:

83 per cent of respondents were supportive, with 52 of 58 members of the public supportive and 40 of the 52 food businesses.

| 22. Do you believe the proposed regulations strike the right balance between ensuring food safety and being practical for food businesses to implement? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 61.48% | 75 |
| 2 | No | | 9.84% | 12 |
| 3 | Not sure | | 28.69% | 35 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q22:

Over 60% of respondents agreed that the proposed regulations strike the right balance between ensuring food safety and being practical for food businesses to implement. Over a quarter were 'not sure'. 40 of the 59 members of the public agreed, while 31 of the 53 food businesses did so.

| 23. How important do you believe a strong food safety culture is in ensuring safe food practices within a business? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Very important | | 76.23% | 93 |
| 2 | Important | | 18.03% | 22 |

| 23. How important do you believe a strong food safety culture is in ensuring safe food practices within a business? | | | | |
|---|---|---|---|---|
| 3 | Somewhat important | | 3.28% | 4 |
| 4 | Not important | | 0.00% | 0 |
| 5 | Don't know | | 2.46% | 3 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q23:

94 per cent of respondents recognised the importance of a strong food safety culture. No respondents disagreed. 50 of the 53 food businesses rated it as 'important/very important', while 52 of the 59 members of the public regarded it as 'very important'.

| 24. Do you support the inclusion of a requirement to promote a positive food safety culture in the new regulations? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 83.61% | 102 |
| 2 | No | | 5.74% | 7 |
| 3 | Not sure | | 10.66% | 13 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q24:

84% of respondents supported the inclusion of requirements to promote a positive food safety culture in the new Regulations (currently not included). Members of the public were particularly supportive with 56 of 59 doing so; among food businesses, the figure was 39 of 53.

| 25. How confident are you that your current food safety practices reflect a strong food safety culture? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Very confident | | 33.61% | 41 |
| 2 | Somewhat confident | | 23.77% | 29 |
| 3 | Not very confident | | 7.38% | 9 |
| 4 | Not confident at all | | 8.20% | 10 |
| 5 | Not applicable | | 27.05% | 33 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q25:

Food businesses were best placed to answer this question. All of them were 'very confident' or 'somewhat confident'. By contrast, among members of the public, 19 of the 30 respondents were 'not very confident' or 'not confident at all', and only six 'very confident'.

| 26. Would you find it helpful if the Government of Jersey provided a self-assessment tool to help businesses evaluate their food safety culture? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 77.05% | 94 |
| 2 | No | | 6.56% | 8 |
| 3 | Maybe | | 16.39% | 20 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q26:

Over 77 per cent of respondents signalled their support for a self-assessment tool to help businesses, with this positivity being shared by both food businesses and members of the public.

| 27. Do you support the introduction of a new licensing scheme for food businesses in Jersey? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 58.68% | 71 |
| 2 | No | | 20.66% | 25 |
| 3 | Not sure | | 20.66% | 25 |
| | | | answered | 121 |
| | | | skipped | 8 |

## Summary Q27:

Nearly 60 per cent of respondents supported the introduction of a new licensing scheme for food businesses; 20 per cent were against and 20 per cent 'not sure'. 41 of the 59 members of the public were supportive, with 14 per cent not sure; 24 of the 53 food businesses were supportive, 18 against and 11 not sure.

| 28. Do you agree that licensing should replace the current food registration system to better reflect the importance of food safety compliance? | | | |
|---|---|---|---|
| Answer Choices | | Response Percent | Response Total |

| 28. Do you agree that licensing should replace the current food registration system to better reflect the importance of food safety compliance? | | | | |
|---|---|---|---|---|
| 1 | Strongly agree | | 33.88% | 41 |
| 2 | Agree | | 23.97% | 29 |
| 3 | Neutral | | 27.27% | 33 |
| 4 | Disagree | | 9.09% | 11 |
| 5 | Strongly disagree | | 5.79% | 7 |
| | | | answered | 121 |
| | | | skipped | 8 |

## Summary Q28:

Over half of respondents supported the proposal. 39 of the 58 members of the public 'strongly agreed/agreed', with 15 neutral. Among the 53 food businesses, 26 were positive, with 13 disagreeing and 14 neutral.

| 29. Do you support the proposed risk-based approach to licensing, where higher-risk businesses are subject to more oversight and higher fees? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 45.90% | 56 |
| 2 | No | | 24.59% | 30 |
| 3 | Not sure | | 29.51% | 36 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q29:

Some 46% of respondents supported the idea of a risk-based approach to licensing where higher-risk businesses are subject to more oversight and higher fees. Around a quarter were against and around 30% 'not sure'. Food businesses opposed the proposal – albeit very narrowly – 22 to 21. Ten were not sure. Members of the public were more supportive (28 of 59), but 24 were not sure and seven not supportive. Of the six representative bodies/ professional organisations responding, four were supportive and two not sure.

| 30. Do you believe the proposed fee levels (£200 for low risk, £350 for medium risk, £500 for high risk) are fair and proportionate? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 23.77% | 29 |

| 30. Do you believe the proposed fee levels (£200 for low risk, £350 for medium risk, £500 for high risk) are fair and proportionate? | | | | |
|---|---|---|---|---|
| 2 | No | | 39.34% | 48 |
| 3 | Not sure | | 36.89% | 45 |
| | | | answered | 122 |
| | | | skipped | 7 |

## Summary Q30:

40 per cent of respondents were not supportive of the proposed fee levels (£200, £350, £500), while just under 25 per cent were supportive and over 36 per cent 'not sure'. Among food businesses, 34 of the 53 respondents were not supportive; 14 were 'not sure' and five supportive. 'Not sure' attracted the most responses from the public (28 of 59), while 21 were supportive and ten against.

| 31. Would a single, streamlined licensing process reduce administrative burden for businesses or organisations? | | | | |
|---|---|---|---|---|
| Answer Choices | | | Response Percent | Response Total |
| 1 | Yes | | 58.68% | 71 |
| 2 | No | | 10.74% | 13 |
| 3 | Not sure | | 30.58% | 37 |
| | | | answered | 121 |
| | | | skipped | 8 |

## Summary Q31:

Nearly 60 per cent of respondents recognised that a single, streamlined licensing process would reduce the administrative burden for businesses. Over 30 per cent were 'not sure'. The choices made were broadly the same across food businesses and members of the public.

| 32. Do you agree with the principle of 'earned autonomy', where businesses with a strong record of compliance may benefit from reduced inspection frequency or lower fees? For example, schemes like Red Tractor certification could be used to demonstrate high standards. | | | | |
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| Answer Choices | | | Response Percent | Response Total |
| 1 | Strongly agree | | 34.71% | 42 |
| 2 | Agree | | 25.62% | 31 |
| 3 | Neutral | | 23.14% | 28 |
| 4 | Disagree | | 9.92% | 12 |
| 5 | Strongly disagree | | 6.61% | 8 |
| | | | answered | 121 |

| 32. Do you agree with the principle of ‘earned autonomy’, where businesses with a strong record of compliance may benefit from reduced inspection frequency or lower fees? For example, schemes like Red Tractor certification could be used to demonstrate high standards. | | |
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## Summary Q32:

Around 60 per cent of respondents ‘strongly agreed/agreed’ with the principle of earned autonomy, with 35 of the 53 food businesses positive and 12 neutral; 31 of the 59 members of the public agreed, with 15 neutral.

All personal and business information or references have been removed for confidentiality (...) No changes have been made to the grammar or spelling of the responses.

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| 1 | As a member of the public | Food sold should have a list of ingredients available as many allergies are not in them “main” list and require a review beforehand. |
| 2 | As a member of the public | As an individual with specific dietary needs, it has become increasingly difficult to purchase food in Jersey and even when doing so being confident that it is actually safe for consumption. Suppliers do not understand (and in some cases give the impression they do not care) about the differences in halal, pescatarian, vegetarian, vegan, etc. and on occasion hazard a guess to encourage completion of a sale. If providers find it too onerous or difficult to tell you what they put in the food they have prepared, they shouldn't be trusted to run a business. |
| 4 | As a member of the public | I think it should be mandatory for labelling to include carbohydrate values to make it easier for diabetics, by weight of item not just the 100g value. Also high fat or cholesterol traffic light style may be useful,for those with gall bladder issues.<br><br>Allergens must be taken more seriously, and should even be displayed at charity sales. Schools and hospitals and other government establishments should lead, with exemplary food hygiene standards. Food should not be brought in from homes and served to children unless the food hygiene standards are proven and allergens can be listed, alongside carb, fat values. Current standards are not adequate and do not meet the governments own standards for inclusion. Food hygiene provisions such as refrigeration of packed lunches in schools should be available and mandated.. Hospitals should allow food to be brought in for patients, only if it contains no allergens that will impact others on the ward. Safe storage should be offered also. |
| 5 | As a member of the public | Dietary requirements need to be taken seriously. It should apply to all places that provide or sell food, even staff canteens and the laws should be reviewed annually in line with UK updates. Not only will this help the public and tourists make informed decisions, it could also help people make healthier choices if they don't have dietary requirements. Living with an intolerance to a wide range of foods is hard enough, but it must be a million times harder if you're allergic. |
| 6 | As a member of the public | Article 12 of the law relates to hedge veg stands and I think this needs to be considered very carefully, otherwise it will result in farmers closing these stands. They are unique in Jersey and should be afforded a level of protection. I note the proposals only relate to 'pre-packed food' and the definition of this is quite technical. Whatever happens, it must not mean that vegetables (as an example) have to bear ingredients and allergens as this will be totally over the top. |
| 7 | As a member of the public | Q15 can’t be answered accurately because it poses 2 questions within one and I would answer yes to the first and no to the second. |
| 8 | As a member of the public | Fines not proportionate to the risk. If I ingest the food I am allergic to I will be severely impacted |

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| 9 | As a member of the public | We need stronger food hygiene and allergy awareness. However I dont agree with the charging for the scheme / inspection. It's free in the UK. Charging business on top of the cost to business to change practice and train staff makes this a government money making scheme rather than bringing Jersey Food Laws up to modern standards to protect the public. |
| 10 | As a member of the public | The often used 'allergens may be present ' and lack of labelling on menus is putting visitors off coming here and putting us far behind the UK |
| 11 | As a member of the public | The question about QUID/sausage rolls is extremely poorly designed. |
| 12 | As a food business | - |
| 13 | As a food business | The fact that the government is putting a framework in place and getting a struggling hospitality sector to fund it, is LUDICROUS. In Food businesses we are well aware that the enforcement for food safety is massively understaffed. It should not be put on us to fund it. Totally agree with the allergen changes BUT not at all with fees, especially for small businesses. |
| 14 | As a member of the public | Question 15 is formulated to give 2 answers. Please edit it so it does not alter your results |
| 15 | As a member of the public | Question 15 is very ambiguous - it's written as an "or" question but has "yes/no" response options |
| 16 | As a member of the public | Consideration should be given to a co-equal status for both English and French on labelling.<br><br>This would potentially resolve the concern around the Norman market but also increase direct imports from France more broadly which could reduce food prices and benefit the economy more broadly.<br><br>The current opt-out for Portuguese shops could be retained, but the wording "English, French or a language understood by the intended customer". This reflects the legal status of French as an official language of the island. |
| 17 | As a member of the public | As a parent of a child with an anaphylaxis allergy, we rarely feel safe eating out in Jersey due to the lack of knowledge about ingredients in the food they cook - in most local restaurants in our experience. When we look at menus in advance online with allergens listed, we often find that the menu or ingredients lists is out of date when we visit which is unacceptable and makes planning ahead extremely difficult. It is the complete opposite experience when we visit the UK, staff are very knowledgeable and efficient in their processes in all cafes and restaurants and there really is no excuse for Jersey not to be in the same position. Allergies are life threatening and not a choice. |
| 18 | As a representative body/professional organisation | It is very important for Jersey to update their food regulations in particular around food labelling for top 12 allergens. It could save a life. |

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| 19 | As a food business | I would like to see a universal use of the same icons or method of displaying allergens on menus across all food businesses in Jersey to make it clear to the public at first glance which foods contain allergens. Presently, some establishments use a number code and some use icons and different icons are often used. It could be made a lot simpler.<br>Finally, Perhaps this isn't the place to mention this but could the revamp of the liquor license also be included in a consultation addressing the ability for a well regulated restaurant to sell alcohol to a customer wishing to take it away and drink on the beach with a picnic or to takeaway a pizza with a bottle of wine or to take the remainder of a bottle of wine home after eating in a restaurant if the wine hasn't been finished. All these examples are requested regularly and are against the current liquor law. The customer can either go to a supermarket or an off license to buy a bottle of wine, so why can they not purchase it from a cafe or restaurant to accompany their meal or in the case of an unfinished bottle of wine with a meal in a restaurant, currently the customer has to drink the remainder when they don't necessarily want it, therefore encouraging drinking beyond someones required level or they have to leave it behind which leaves them feeling cheated. Unless the restauranteur allows them take the unfinished bottle, which is actually breaking the current law. |
| 20 | As a member of the public | Food needs to be clearly marked and labelled regardless of he setting or place of business. This is people's lives that need to be considered. Having a family member who could die from eating food make in a kitchen that contains nuts for example is a frightening thought and prevent us being able to take the child out to eat for fear of not knowing how food was prepared and where. |
| 21 | As a member of the public | I have coeliac disease and I am constantly shocked at how little restaurants etc know about the food they're serving. So many places don't even know if a dish contains gluten or not and it's very worrying for those of us with serious dietary requirements. There definitely needs to be more in place to hold businesses accountable to knowing and clearly displaying what allergens are in their products. I don't think they realise in doing this, they would get more customers as people like me would know they can eat there! |
| 22 | As a member of the public | As a mother of a son with multiple food allergies whilst restaurants have had allergen information available when we arrive it is hard to get it online before we go so difficult to know what he will.be able to eat. Restaurants will.often tell us just to ask the server when we arrive however we would like to know prior to arriving. My son has milk and egg allergy so it is not always obvious looking at a menu what he can eat. |
| 23 | As a food business | the cost recovery under licensing would require further explanations, as if a business is classes as higher risks would incur more charges for visits? |
| 24 | As a member of the public | I completed this survey as a member of the public and didn't seem to have as many questions geared towards that. I would like to comment that eating out in Jersey can be extremely difficult with an allergy and having labelling on menus is few and far between, I'd like to see this mandatory in Jersey as it's very difficult to know where is able to cater to dietary needs without this. There is also a lack of supply in supermarkets - I am gluten free and find so many |

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| | | plant based fresh/frozen options but very little fresh/frozen gluten free options, it would be helpful if supermarkets had more of this as often I have to go to multiple shops in order to find a product. |
| 25 | As a member of the public | I worked in a school that managed to get a 5 star safety food hygiene rating and the school is disgustingly dirty in the hall where food is served.<br>Also food heating up to unsafe temperatures after delivery because of the time it takes to get the food put away in school freezers.<br><br>There is also not a good system in place for children with allergies or religious preferences in schools and I have seen children with allergies and religious preferences given the wrong food.<br><br>Staff that have done food safety courses and don't have a good understanding of English and even after the course they still don't understand that someone can die or get seriously ill because of an allergy and also the same staff with no idea of cross contamination or sometimes even basic hygiene.<br><br>Also managers that miss or make mistakes with vital allergen information provided to schools.<br><br>So all in all if the government are to be doing this it would be nice if they get it right for once and employ the right people and not someone from a high managerial role elsewhere that has no restaurant or food background!<br>Also much stricter hygiene standards to get a five star rating!<br><br>Allergies cannot be taken lightly and if this is to be implemented then for once the government need to get it right before it's rushed out to meet a deadline!!! |

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| 26 | As a food business | Whilst I of course agree with allergen information being easily accessible for customers and clients, I do feel we are placing more red tape and huge burden on already strung-out businesses, just to cater for 6% of the population. It's all very emotive saying we need to be more 'inclusive' but at what cost?<br><br>Current allergen practices have worked well and I have not been to any restaurant in Jersey for years where allergens, or an allergen disclaimer stating they can't guarantee no cross-contamination, isn't displayed on the menu. I completely disagree that these blanket statements are unacceptable, as those with severe allergies do not take risks and will simply not eat in a place that can't guarantee their safety - it's therefore down to the individual (as it should be!) to protect themselves where safety cannot be guaranteed and should categorically not fall to the business. Some premises have tiny kitchens and simply cannot guarantee zero cross contamination, so will they soon all be shut down? In trying to be over cautious in protecting a few, you will kill multiple businesses. Businesses that are already seriously struggling with the huge increases in ingredients cost, wages, rents, transport, utilities, packaging..and on it goes.<br><br>Which leads me to my next point of how poorly timed and harmful this proposed licensing scheme is, when businesses are having to fight for every penny at the moment. It is impossible to ignore how many hospitality businesses have and are going under in Jersey and therefore how it is nothing short of cruel to lumber them with yet another cost and increased red tape. I agree with the principal but it just comes across as yet another tax on businesses, which will simply cease to exist - the way things are going - and then what are we left with? More people leaving the island, lower employment and more joy sucked out of daily life..with absolutely nothing to show for it.<br><br>We have only ever held 5* for all iterations of our business - ... - so I have no problem following the rules and running a tight ship, as it's simply good business practice and I wouldn't operate any other way. Whilst I do appreciate others operate differently, a quick look on Eat Safe shows the vast majority of businesses are 4 stars or above, meaning they are making excellent efforts to operate safely. This is encouraging and shows as an island we care about food safety and are customer focused. Without question, a bad rating is bad for business and the Eat Safe scheme has done a great job at keeping us in check, as it should. I feel these proposed changes and costs are too much too soon, particularly in this current economic climate with hugely increased overheads, dramatically fewer visitors and terrible transport/shipping links making day-to-day operations that much harder and expensive for all. I do hope further consideration is given therefore to just how damaging this could be to our already beleaguered but hugely valuable hospitality industry here in Jersey.<br><br>Thank you for the opportunity to comment - I would welcome further discussion on this matter, should it be required. |

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| | | NB: Question 15 needs amending, as I would answer 'no' to the first part and a resounding 'yes' to the second, but there is no option to provide two answers -<br>15. Is it necessary to require Quantitative Ingredient Declarations (QUID) labelling for meat content in Pre-packed for Direct Sale (PPDS) food (such as stating 'pork (80%)' on a sausage roll) or does this place an excessive burden on small businesses, particularly in Jersey? |
| 27 | As a member of the public | I don't agree we should label food for allergy purposes |
| 28 | As a food business | We don't think the introduction of another government led tax on our industry is fair given an already perpetually increasing alcohol duty and minimum wage which serve only to fund government. Any more cost increases are likely to further damage an industry that is already struggling with the combined impact of higher operating costs and deflated demand. We are particularly against a system that gives financial incentive to conduct as many visits as possible to increase charges and drive further unnecessary complication, bureaucracy and government expenditure. This looks like another thinly veiled attempt at taxing the island. |

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| 29 | As a representative body/professional organisation | In response to the call for comments on the proposed secondary legislation for food safety in Jersey, I submit these insights as a food safety and training consultant, contributing writer for ..., and tutor at ...<br><br>The focus of my feedback is specifically on food safety training, with a particular emphasis on how Jersey's proposed legislation can best support the development of a skilled and confident workforce in the food industry.<br>1. The Need for a Food Safety Training Ecosystem<br>For food safety to truly succeed, businesses must cultivate an ecosystem that supports the practice and development of skills. Food businesses need a training framework that not only meets compliance requirements but also fosters the development of practical skills and the confidence required for consistently producing safe food. When designed effectively, this ecosystem leads to greater accountability, enabling employees to translate their learning into workplace improvements in food safety practices.<br>This requires a shift from simply meeting regulatory standards to ensuring that staff members gain the competency and confidence needed to address food safety challenges in the workplace. Employees should understand why they perform certain tasks and how to comply with regulations. This deeper knowledge empowers them to make informed decisions, adapt to changes, and ultimately contribute to a stronger food safety culture.<br>The proposed secondary legislation provides a unique opportunity to implement a holistic, competence-driven training model that aligns with Jersey's food safety goals. Moreover, food safety training should be aligned with business goals and direction, ensuring that training supports the broader objectives of the food business, such as improving operational efficiency, customer satisfaction, and risk management.<br>2. Addressing the Shortcomings of Current Online Food Safety Training<br>While online food safety training is widely used, many current programs fail to adhere to essential adult learning principles, which are critical for fostering deep learning and behaviour change. Most available online training programs are theory-based, presenting content in a passive, one-size-fits-all format that does not engage learners in a meaningful way. These programs don't follow good instructional design principles. This approach often falls short in developing the necessary skills for employees to consistently apply food safety practices on the job.<br>Adult learners benefit from active, engaging, and contextualised learning experiences that reflect the specific challenges they face in the workplace. Theoretical content alone is insufficient to drive lasting behaviour change. A shift toward more dynamic, interactive, and workplace-contextualised training strategies will not only improve employee engagement but will also support the long-term sustainability of food safety practices across the sector.<br>Furthermore, the high standards of food safety that result from effective training can serve as a powerful marketing tool to attract and retain both local and international tourists, building trust and ensuring high levels of consumer satisfaction.<br><br>3. The Importance of Risk-Based, Targeted Training |

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| | | Training should be an ongoing process, not just a one-off compliance check. Food safety is an ever-evolving field, with emerging risks, allergens, and new safety protocols constantly shaping the landscape. The legislation should support continuous learning, ensuring food businesses not only comply with the law but also actively improve their food safety practices in response to new challenges and opportunities.<br>A targeted, risk-based approach to training will help businesses prioritise the most significant hazards and ensure employees have the skills needed to reduce those risks effectively. This approach will be most impactful when aligned with the specific needs of each business, considering their unique risks and operational complexities.<br>4. A Shift from Compliance to Competence<br>A prevalent issue in the food industry today is the overemphasis on compliance, often at the expense of true competence. This compliance-first mindset has led to widespread use of generic online training programs that may tick the box for regulatory requirements but do little to build the skills and behaviours needed in food businesses to consistently produce safe food.<br>To achieve optimal food safety outcomes, Jersey's food businesses must shift the focus from merely meeting compliance standards to fostering competence in food safety practices. This shift will help better equip businesses to prevent food safety failures, such as foodborne illness outbreaks and allergen mismanagement, and offer greater protection for consumers.<br>Modern approaches to employee learning, which focus on personalised, adaptive, and real-time learning experiences, can support this shift. These methods will ensure that employees not only understand regulations but also internalise the skills and decision-making processes required for successful food safety practices.<br>Conclusion<br>The proposed secondary legislation offers a valuable opportunity for Jersey to enhance food safety outcomes by incorporating a focus on employee training and development within the regulatory framework. To ensure long-term success, the legislation should emphasise a shift from compliance-based training to competence-driven, risk-aligned training that follows adult learning principles. By creating an ecosystem of inclusive, hands-on training that is aligned with workplace risks and aligned with business goals, Jersey can develop a food industry workforce that is capable, confident, and committed to producing safe food at every stage of the food supply chain.<br>Thank you for considering my feedback. I look forward to the finalisation of this legislation and am happy to offer further advice and support as needed. |
| 30 | As a member of the public | It is important to remember that water is also a food |
| 31 | As a member of the public | Introducing standard charge licensing fees will probably put a lot of very good small businesses out of business. For example home based cake makers etc. They probably take more care than the larger food businesses dealing in larger quantities and making more profit. If licensing fees have to be introduced maybe the size of the business should also be taken into consideration. |

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| 32 | As a food business | This appears to be out of date before it is even implemented.<br>Anyone can have an allergic response to anything. There are key omissions in the allergen list such as MSG (monosodium glutamate) and nitrites now commonly added to processed meats. Most allergic responses are due to the ultra-processing or chemical-based production of the food, i.e. it is not the 'raw' ingredient itself which is the issue but rather how it has been produced (gluten and wheat being a prime example, with traditional wheat varieties not giving rise to the same gut issues), or processed (e.g. milk).<br>This is merely a sticking plaster, without addressing any of the root causes. It is adding yet another layer or bureaucracy and cost to 1. small businesses, and 2. the hospitality industry, or 3. farmers. All 3 sectors are already overloaded with red tape and taxation. If you want to continue to kill entrepreneurship and Jersey full stop, you're going the right way about it.<br>Why not educate comsumers instead, divest responsibility to the consumer to vote with their £ to businesses that either provide the information they require or they have enough confidence in to know their food purchases are 'safe' for them?<br>Nutrient information is particularly out dated. Are you talking about calories, kJ, fats and proteins? Categorised by a system supporting and lobbied by global UPF producers? What about nutrient-density of food?<br>The human gut biome is affected by the soil biome of where food is produced, along with the mineral and vitamin content. Producers and people who truly care about health, and are accordingly responsible, are both going to be penalised by this. |
| 33 | As a member of the public | As a doctor with family members who have severe food allergies I am keen that all efforts are made to list allergens and ingredients in both pre prepared packages foods and loose food though appreciate that contaminants could enter especially the latter. A full list of ingredients is important for those who are allergic to substances outside of the main 14 allergens. Prevention of cross contamination training is vital. |
| 34 | - | Will this Food License be paid on a yearly basis? |
| 35 | As a food business | The proposed regulations (allergen labeling, hygiene, licensing) are sound, but clear guidance is essential. Provide templates for allergen info, hygiene checklists, and licensing to ease compliance, especially for small businesses.<br><br>English allergen info is critical, but allow flexibility for other languages. Provide multilingual translation guides for inclusivity.<br><br>Launch a campaign to educate consumers on allergen labelling and licensing, building trust and compliance.<br><br>Exemptions for charity events and markets are practical. Although i would suggest Providing guidelines & fact sheets to ensure basic safety and allergen awareness. |

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| 36 | As a member of the public | Having a severe food allergy is a life threat ing medical condition, it is not a choice. It affects people's everyday life and the food allergy law needs to be implemented as soon as possible. It is not about protecting small business it is about being inclusive to everyone and allowing people with life threatening allergies to eat out and socialise with friends. If business's get on board and make a good job of it, the customer feedback will be positive leading to more customers and more business.<br>Current businesses claiming they can't guarantee an allergen isnt present so don't eat here is not acceptable in our society!<br>We have to be an inclusive society for neurodiverse people, disabled people and people with medical conditions, severe allergies is no different! |
| 37 | As a member of the public | Most cafes and restaurants in Jersey are unsafe for those who need to eat a gluten free diet and who have Coeliac Disease. Too many places do not know what Coeliac Disease is, and the importance of cross contamination. Of everywhere in Europe I have travelled, Jersey is the worst for this. Educating all staff who work in the industry, from waiters to chefs, will massively help to make things safer. The introduction of legislations is a must. |
| 38 | As a food business | As a small cake business owner any fee on top of what I am already paying out will cause more stress and make owning a business pointless as there is no profit, I do not charge a huge amount for my baked goods so would be making customers pay more when food costs rise and now an additional fee to pay for holding a licence |
| 39 | As a food business | I support the principle of introducing a new licensing scheme to replace the current registration system (Q27 & Q28). Licensing carries more weight, better reflects the importance of food safety compliance, and could strengthen consumer confidence if implemented fairly.<br>I also agree that a single, streamlined licensing process would reduce administrative burden (Q31), provided it is simple, online, and avoids duplication. This would be a positive step for both businesses and regulators.<br>However, I do not believe the proposed fee levels (£200, £350, £500) are fair or proportionate for very small and artisan food businesses (Q30). For micro-businesses like mine, even £200 can represent a significant annual burden, while £350 would be disproportionately high compared to turnover.<br>To ensure fairness and sustainability, I recommend that the Government considers:<br>Tiered fees based on both turnover and risk, so micro and artisan producers are not penalised.<br>Reduced fees or exemptions for very small businesses below a certain turnover threshold.<br>Discounts/incentives for consistently compliant businesses (e.g. high Eat Safe ratings, Genuine Jersey members).<br>Overall, I support modernising Jersey's food laws and believe licensing can provide a clearer and fairer system. But the new framework must remain proportionate, supportive, and practical for micro and artisan producers, who contribute greatly to Jersey's food culture and economy. |
| 40 | As a food business | We are a small business, we sell pre packed food, we already pay enough what with gst data protection etc this is another cost we don't need and it's high for us, it isn't fair! Fine those that don't follow regulations and are rated 1 star because there is zero incentives for these low rated businesses to improve don't charge those that comply |

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| 41 | As a food business | There should be comment boxes next to each question. There are quite a few questions that are "loaded" questions and don't provide the chance of providing any feedback other then yes or no. |
| 42 | As a food business | Whatever is introduced should be a benefit for end users, with the least admin possible and no additional cost to businesses |
| 43 | As a food business | The industry doesn't need additional costs added |
| 44 | As a food business | Any additional financial burden is un welcome, especially as the government is already guilty of cost inflation practices.<br>Food allergies affect approx 6% of the population and it is imperative that those individuals obtain as much information as possible from suppliers of food and beverages before consuming them. Food & beverage providers can only take on certain levels of precaution before the cost of the precaution increases the cost of production and makes the food unaffordable for everyone. No food provider wants to poison their client, it's simply not good for repeat business or one's reputation. The government has an obligation in this effect but must ensure that its regulation does not drive the business under. |
| 45 | As a food business | I support the new law. However I am extremely disappointed with Jersey E, P& H in the past 5 years. Incompetent, varied standards from varied staff. Already we are contributing with our business tax so really do not understand the extra cost for a small business... AGAIN.<br>This and other expenses is exactly no help to small businesses. Really do think that our current civil servants should have this implemented into their workload and yes inspect correctly. |
| 46 | As a food business | Verbal provision of information re allergens/food hygiene practices should never be accepted (i.e. an international market provides food labelled in a different language but the same info must be available in English in writing). I agree with the principle of earned autonomy in terms of reduction of fees for operators showing an excellent track record over the years (=reward the good practice), but not a reduced frequency of inspections that may lead to complacency. |
| 47 | As a member of the public | I really do support fees being based on risk and the known and evidenced historical behaviour and practice of food business. |
| 48 | As a food business | How will inspectors measure a 'culture' of good food safety in a business? Will the Gov provide guidance?<br>Why should Norman Market traders have less or no allergen labelling? Being in the EU they will have to have all labels in French and English anyway.<br>I don't agree with charging another licence fee. It will hurt the hospitality industry even further. |
| 49 | As a food business | I support the proposed legislation around clearer food labelling and allergen information, but I do not agree with the introduction of a single, flat licensing fee. A one-size-fits-all registration is not proportionate. It places the same cost on small independent businesses like mine as it does on large supermarkets with far greater resources. I would ask that consideration be given to a tiered or scaled approach so that the system is fairer and does not disadvantage small local producers. |

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| 50 | As a food business | 1. If we were to introduce food hygiene laws that reflect the UK model (which accounts for approx 70% of our visitors), then we need to follow it closely as they will expect the same higher standards, even if visiting for a short period. It is painful as a business to absorb these costs and perhaps the GoJ could partner with Digital Jersey to implement the digital transformation of recipes etc - especially for small businesses - and ensure they are practicable and affordable. Especially for a 'mom and pop' enterprise.<br>Re the language used, and despite the prevalence of other nationalities in Jersey, the language by default on all packaging should be in English.<br>Re the allergens, there should be a provision that business and schools should be able to hold (securely) some auto-injector pens in case of anaphylactic shock. |
| 51 | As a food business | Regulations should be there to support a food business, not used as a tool to raise revenue and over regulate food operations. |
| 52 | As a food business | Government is making it harder and harder for hospitality business to be successful and all the additional costs just add more pressure. That is fact.<br><br>Of course we need new regulations on labelling and food hygiene etc but to even ask if we think it is acceptable for French markets to come and sell their produce and not have to label their goods and have less stringent rules than local business is shameful! |
| 53 | As a representative body/professional organisation | Where charity sales include food it is a MUST that the food sold has allergen warnings.<br>It would also be beneficial that early years settings have a separate food legislation as having to follow the same rules as a the food industry is ridiculous when all we do is open lunch boxes! |
| 54 | As a food business | I have wondered over the years as to the current system as to why when a business has been given a 0 mark after inspection that they are actually allowed to continue trading |

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| 55 | As a food business | Feedback on Draft Food (Jersey) Regulations 2025<br>Introduction<br>I like the idea that enforcement should be supportive, but in reality that's not how it feels right now. Inspections often come across as "do what I say" rather than helping or advising. Officers will need proper training if that's really going to change.<br>Consumer Information<br>Menus and Nutrition: I don't think full nutrition details on menus are realistic for most places. The UK gives small businesses exemptions and Jersey should do the same. Language and Labels: For places serving mainly non-English speaking customers, there needs to be some flexibility. QR codes aren't much use to elderly guests or people without smartphones. If food arrives without English on the label, we shouldn't have to throw it away — being able to relabel in-house would make sense. Responsibility for that should really sit with the supplier, not the restaurant. The rules also seem stricter than the UK, where allergen info can be in another language if the customer understands it. Why should Jersey be tougher? Norman Market: I don't understand why the Norman market would get an exemption. French traders should already be following EU allergen and labelling rules, so why are they treated differently? Due Diligence: Inspectors also need training on what "reasonable precautions" actually mean, not just enforcing their own personal view.<br>Practical Application<br>Keeping full recipe books for inspection feels excessive compared to UK practice, where an allergen matrix or menu declarations are enough. Clear guidance is needed on "may contain" warnings too — they should be passed on to customers, not ignored or turned into definite "contains" labels.<br>Charity & Cultural Events<br>Exempting small charity or cultural events from allergen rules could put people at risk. Even a simple allergen note would help, like in the UK. It could also confuse the public — people now expect allergen info everywhere. Clear rules are needed on what counts as "small scale," otherwise bigger events might slip through.<br>Imports with Unusual Processes<br>Allowing chlorine-washed chicken or hormone-treated beef would badly damage trust. These products are banned in the UK and EU for a reason. If Jersey allowed them, hotels and restaurants would be stuck explaining to guests why our standards look lower.<br>New Labelling Rules<br>Nutrition Panels: If local grab-and-go items don't need nutrition panels, visitors from the UK are going to be confused. It makes more sense to align with UK rules and keep things consistent. Meat Content (QUID): Requiring meat % labels goes beyond UK law and isn't practical. Chefs can't weigh and calculate every batch of burgers or pies without new equipment. Artificial Colours: Making restaurants declare artificial colourings also feels unnecessary. There's no real demand from customers, and it would be a nightmare for hotels with changing menus. Enforcement could end up inconsistent too. Allergens are already declared — that should be enough. |

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| | | Food Hygiene & Safety<br>Training should match the job role, just like in the UK: Level 2 for food handlers, Level 3 for supervisors. HACCP training shouldn't be required for every staff member, especially with high turnover and seasonal roles. It should stay focused on those actually writing or managing HACCP plans.<br>Licensing & Food Safety Culture<br>Licence Fees: It feels unfair that UK registration is free but Jersey businesses would be charged £200–£500 a year. This just adds more costs when hospitality is already struggling. If fees are brought in, they should at least be tied to actual inspection visits. Food safety is a public health matter — it should be funded by taxation, not by extra charges on caterers. Food Safety Culture: The idea of a "food safety culture" is fine in principle, but it's vague and could be judged differently by each inspector. Clear guidance would be essential. A phased approach or voluntary self-assessment would be more realistic before making it a legal requirement |

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| 56 | As a food business | Will environmental health officers in Jersey actually be trained to take a supportive approach? At present, our experience is that they tend to focus purely on compliance, without offering much guidance or encouragement.<br><br>2. Nutrition on Menus<br>Will caterers be expected to include full nutritional information on menus, and if so, will there be any exemptions, similar to the UK approach?<br><br>3. Allergen Information in English<br>• If products arrive without English labelling, are we expected to reject them, or will we be allowed to relabel them on site? And if relabelling is needed, will that responsibility sit with the supplier or the restaurant?<br>• If UK law allows allergen information to be given in another language (as long as the customer understands it), why is Jersey taking a stricter line?<br><br>4. Specialist Markets<br>Why are visiting markets, such as the Normandy market, exempt from these requirements? France is part of the EU, so shouldn't they already meet the same labelling and allergen rules?<br><br>5. Enforcement Style<br>Will enforcement officers be trained to recognise what counts as "reasonable precautions" rather than taking an attitude of "it's my way or nothing"?<br><br>6. Ingredient Lists and Recipe Books<br>At present in the UK, caterers aren't required to keep full ingredient lists or recipe books – only an allergen matrix or clear allergen information on menus. Will Jersey expect more than this?<br><br>7. "May Contain" Declarations<br>Caterers need clarity on how to handle "may contain" warnings found on ingredient packaging. Should these be included in allergen information or not?<br><br>8. Charity Events and One-Off Sales<br>• If allergen rules don't apply at these events, isn't there still a risk to customers?<br>• Shouldn't allergens at least be declared, as they are in the UK?<br>• Will this not create confusion, with the public expecting allergen information everywhere else?<br>• How will inspectors define "small scale"? For example, would a large charity dinner held in a hotel fall outside these rules? |

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| | | 9. Meat Content (QUID)<br>• Why go further than UK law?<br>• How are hotels meant to calculate meat percentages in recipes without new systems and equipment?<br>• Would chefs really be expected to weigh and calculate every batch of burgers, sausages, and pies?<br><br>10. Artificial Food Colours<br>• In the UK, restaurants and cafés don't have to declare certain food colourings. Will Jersey require this?<br>• Is there evidence that customers are asking for this information?<br>• With large and regularly changing menus, how practical is it to keep menus up to date every time a supplier changes an ingredient?<br>• Could this lead to inconsistency, with different inspectors expecting different things?<br>• Is this really necessary when allergens are already being declared?<br><br>11. Training Requirements<br>• At present in the UK, training is linked to the job role – usually Level 2 Food Safety for food handlers and Level 3 for supervisors.<br>• In Jersey, EHOs are already asking for HACCP training on top of this. In the UK, HACCP training is generally for food manufacturing or senior staff responsible for writing HACCP plans.<br>• Is the intention that every food handler, including seasonal or casual staff, will need HACCP training?<br>• How are hotels supposed to manage this with high staff turnover?<br>• Will Level 2 Food Safety certificates still be accepted for entry-level staff?<br><br>12. Licence Fees<br>• In the UK, registration is free. Why should Jersey businesses have to pay annual fees?<br>• This feels like an extra tax on caterers at a time when the industry already faces huge cost pressures.<br>• Will this fee include an annual inspection? If not, why should it be charged every year?<br>• Isn't food safety a public health matter that should be funded through taxation, rather than an additional cost on businesses?<br>• For hotels and restaurants already paying high rents, rates and staff wages, what extra service will we actually get for this new fee?<br><br>13. Food Safety Culture<br>• How will inspectors measure "food safety culture"?<br>• Will there be clear guidance and time to adapt, instead of expecting immediate compliance? |

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| | | • Won't different inspectors risk giving very different opinions, leading to inconsistency?<br>• Wouldn't it be more practical to introduce this gradually, perhaps through a voluntary self-assessment tool before making it a legal duty? |
| 57 | As a representative body/professional organisation | In Jersey, government-sanctioned food systems have historically promoted the use of chemical fertilizers and other synthetic inputs. While these approaches were once intended to secure higher yields, they have degraded soil health, reduced biodiversity, and contributed to the rise of food sensitivities and allergies in both people and animals.<br>As a small island community, Jersey is uniquely vulnerable to these impacts. Our reliance on imported food, combined with an over dependence on industrial agricultural inputs, places both our health and our long-term food security at risk.<br>Rather than creating new layers of legislation and bureaucracy—which our community is increasingly resistant to, we must focus on building a resilient, place-based food system rooted in regenerative principles. Equal funding should be directed into regenerative farming initiatives as is currently spent on legislating food safety. By restoring soil biology, enhancing biodiversity, and reducing reliance on synthetic chemicals, Jersey can lead the way in producing nutrient-dense food that supports both public health and ecological resilience.<br>It is time to stop the poisoning of our food systems and to start investing in regenerative farming practices that strengthen our island's food sovereignty, protect community health, and ensure that future generations inherit a thriving and sustainable food system. |

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| 58 | As a food business | Disagree with charging a license fee to every business.<br><br>Fees should be charged to the business who refuse to correct their errors in compliance with the food regulations and consequently recharged for ongoing inspections creating the business to become compliant and fully regulated to keep the general public safe.<br><br>Online annual inspection to businesses who are fully "EatSafe (5 stars)" with a 3 year fully inspection of the premises and their procedures.<br><br>Honesty Boxes - need regulating ! This is to dangerous to the public where home bakes etc. are sold and no labelling is used ! |
| 59 | As a food business | A blanket fee is in my opinion unfair. Our business already conforms to both regulations and best practices. Fees should be based on the performance of individual businesses. A business that achieves 4 or 5 stars on inspection (on the existing system) and by extension requiring less oversight should pay less. Non conforming businesses, conversely, should be charged more for the extra inspections required. A flat fee that doesn't reflect the performance of a business is, in effect, subsidising non compliant businesses at the expense of those that already strive to produce a quality product and keep consumer safety as a priority. The burden of ensuring consumer safety should fall on the businesses that do not comply. Reduce fees for well run businesses and levy extra charges on those that need extra inspections or fail inspections. |
| 60 | As a food business | we would not like to see tighter regulation than that which applies in England<br><br>Fees should be minimal and business should not be punished with a higher fee for offering their customer base a wider variety of choice and products to choose from as this would fall into the 'high risk' category |

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| 61 | As a food business | Our primary concern is around ensuring a level playing field when it comes to food labelling and managing allergen obligations. The proposed regulations as drafted is essentially bringing an unlevel playing field into law. Whilst we appreciate that we may be held to a higher level of account, we do not feel that in terms of labelling we should be treated differently to other businesses regardless of size. For example we sell products aimed at specific groups of Islanders or nationalities, yet we are required or would be to label them when the same customer could go into another store and labelling is not required. This adds additional cost to the consumer in our stores which cannot be fair or equitable. This also places additional pressures on our colleagues as each store is treated as a separate business. For our french ranges this creates even more challenge, however how is it right that the french markets can operate and sell without the labelling in English yet we have to label the same product day in day out where the same consumers are clearly educated enough or assumed to be to make a conscious decision around buying the same product, say Brie, at the french market.<br><br>In essence we consider that food allergen labelling requirements for pre-packed products should be applied consistently, regardless of the retailers primary market. However, it is worth noting that if a retailer offers a QR code scanning option, customers should also be given the ability to view, ensuring accessibility and informed choice. |

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| 62 | As a food business | As a Jersey registered charity running a popular visitor attraction with multiple catering outlets, we felt it important that … input into the proposed changes to the Jersey Food Regulations 2025. As an organisation that is always striving to improve we support change but want to ensure that change is both implementable and sustainable. From reading the consultation there is a desire to meet and maintain UK standards, which for us makes sense but then some suggestions which go above and beyond the UK or appear to be completely at odds eg the suggestion of importing chlorine washed chicken. We worry that this makes for quite a challenging compliance landscape.<br>It would be useful to understand what support your officers will be able to offer businesses in order to ensure a smooth transition into the new standards. Whilst insightful, a report listing non-compliance with a deadline for rectification does not feel terribly supportive. We would be keen to see some training for our managers, templates and written guidance, and hands-on time with officers outside of a formal inspection framework.<br><br>Section A: Food standards, including labelling and food allergens<br>As an organisation that welcomes members of the public into our catering outlets, ingredient and allergen labelling is really important to us.<br>o Whilst pre-packaged goods typically contain information in ingredients, allergens, origin and nutrition, menus (eat in an take-away) do not. Will we be required to add this information onto the menu or have this in a separate file for customers/staff to review if requested?<br><br>o It would be helpful to understand whether the onus will sit on the supplier or the catering outlet to ensure labelling meets the new requirements. Whilst we try to source as many ingredients as possible from the island, we do use numerous imported products. If non-Jersey suppliers cannot/ will not adhere to these new regulations, are would we be responsible for re-labelling the products when they arrive on site? If so, this will present an additional administrative burden which raises concerns for our small team and if not we risk not being able to source essential ingredients or having to look for new suppliers, again an administrative task that we could do without.<br><br>o Guidance on how to deal with foods with ‘may contain’ labelling would be useful. Should these be listed as declared allergens or should we be making it clear that the supplier has labelled it ‘may contain’?<br><br>o As a registered charity, it would be useful to have some clarity on what would constitute a ‘small scale event’. Whilst we recognise that the catering outlets … would must adhere to this legislation, we also host smaller fundraising or community engagement events. To avoid any doubt we would internally seek to apply the same standards across all … activities but this does mean there may be inconsistency between how we and other charities approach such events.<br><br>o With regards the new labelling requirements, the proposal document does not make it clear exactly where |

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| | | these will apply, is this only for pre-packaged goods or also required to be declared on menus within a restaurant setting?<br>There is no legal definition of what constitutes a small business so with regards nutrition labelling, it would be useful to have some clarity here. Also what constitutes a 'key ingredient' and will there be any support offered to accurately calculate this? The labelling of food colours is not required in the UK so it would be useful to understand the thought process behind doing something different in Jersey, where up to this point we have been aligning with UK legislation?<br><br>Section B: Hygiene and food safety<br>We are committed to maintaining high food safety standards.<br>o Under the proposal for training requirements, it would be helpful to get some clarity on whether Level 2 in food safety for food handlers will be acceptable, or whether they will need to obtain Level 3 certification. Similarly will HACCP training be required for all food handlers?<br><br>o As an organisation that utilises temporary staff during peak seasons, it is important to us that we fully understand any new training requirements. What support will be available to help us meet these new requirements eg financial assistance towards training, increased provision of training in appropriate languages, phased implementation?<br><br>o Whilst you have stated this will not be part of the regulations, we are interested to understand how you plan to measure 'positive culture'. Will this be a similar to the HSE safety climate tool which provides an objective measure of safety culture?<br><br>Section C: Proposals for a new licensing scheme<br>As a charity, any proposal that appears to increase our costs is a cause for concern as this diverts funds away from our mission to save species from extinction.<br>o From reading the proposals we expect that … would be categorised as a 'medium' risk, would this mean that we are expected to pay £350 for the licence and then an additional fee for our alcohol license or will this now be amalgamated into one cost?<br><br>o Whilst we appreciate that the management of these new regulations will result in increased costs for the regulator, it would be useful to understand why this cannot be funded through taxation. This feels particularly harsh at a time when tourism is down and costs of ingredients, utilities and staff are rising.<br>Many thanks for the opportunity to participate in the consultation. |
| 63 | As a food business | I think it is crazy to ask any business to pay extra fee and annually just to be in business with food!! We are already regulated and there is no justification for additional fees. Especially when we already pay excessive amounts of |

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| | | money to operate (from alcohol license to JFSC reg to accountants to GST) this is a stealth tactic! And will not help businesses already suffering |
| 64 | As a food business | It's crazy!! Just to grow a product or catch a fish you expect us to pay again!? We are a crippled industry that cannot take additional costs or burdens. We already pay for the right to fish! We have to pay so many fees and it's a crippled industry - it's a stealth tactic |
| 65 | As a member of the public | In regards to good safety, especially primary production, I would like to see heavy disincentives if not an outright ban on the sale of eggs from caged hens. Alongside concerns of animal welfare, eggs from caged hens carry a much larger risk of food poisoning, mostly salmonella. I do not believe it would be burdensome on neither shops nor farms in Jersey, as many chickens here are already raised free range as Jersey has no foxes to predate on them, and many shops have already sworn off the sale of eggs from caged hens. It would affect only the sale of imported eggs from a select few shops that have not yet sworn them off. Frankly, I believe that many purchases of eggs from caged hens are done without realising as most eggs on sale are free range, making it an easy assumption when buying eggs that they would be without checking. I am saying this as it is something I have done before, not having realised at the time that eggs from caged hens were even sold in Jersey. |
| 66 | As a representative body/professional organisation | Where do charities / NPOs fit into the proposed new food regulation?<br><br>Will guidance documentation be issued to support businesses/charities to implement new processes/procedures once new law is passed?<br><br>Some of the responses given are from a charity perspective whose prespective is not a commercial one and does not focus on food sales but supporting clients |
| 67 | As a member of the public | This is a very needed update to legislation, as someone with dietary requirements the amount of places that do not provide this information is shocking, most restaurants do not label their menus and say 'for allergen information speak to a member of staff', and often the staff do not know and have to go ask the chef. This makes it very hard to trust eating out at new places. |
| 68 | As a food business | Food safety does not I believe examine potential toxic, environmental issues like shedding micro particles from plastics, including chopping boards, as well as the effects of chemicals in food preservation and agriculture which are likely to be the real source of 'allergens'. |

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| 69 | As a food business | Draft Food (jersey) regulations 202-<br>We would like to add a few comments and highlight a few concerns relating to the new draft food (jersey) law regulations that will be coming into place soon.<br>1) On the support and encouragement of businesses to demonstrate a duty of care to their customers and guests while continuously improving and maintaining high standards,<br>Hope the enforcement officers will engage on conversations with the businesses to help, support and encourage them to get better and maintain high standards.<br>The enforcement officers are trained to advise and support on how to improve the hygiene standards rather than demand for higher standards without support.<br><br>Section A of the Draft food (jersey) regulations 202<br><br>• About consumers receiving clear, accurate information about the food they purchase, does this apply to the food ordered in restaurants and on-line and take away food ordered on other platforms?<br>If the food businesses are expected to have full nutritional information of their menu items in restaurants, this will be not practical.<br><br>• Allergen information of ingredients purchased through wholesale suppliers, should be the supplier's responsibility.<br>Food businesses will require this information to provide an accurate allergen matrix of the menu items.<br>Most suppliers are now providing the allergen information on their product's online platforms.<br>• Restaurants and food service businesses should be advised about "reasonable precautions" that can be taken by the enforcement officers to maintain safe food productions for consumption.<br>• To provide ingredients list or recipe books are not practical. We believe only the allergen matrix are sufficient for the guests to decide which food items in a menu is safe for them.<br><br>Section B Hygiene training for food handlers.<br><br>• We believe the level 2 food safety for food handlers is adequate in general. For more senior rolls within the kitchen teams to have HACCP training and level 3 food safety training.<br>Section C<br>• Agree that all food businesses need to show that they promote a positive "food safety culture"<br>Would the inspectors initially advise and provide clear guidance on what the "food safety culture" should be for all different food businesses?<br>Once this information is passed on, allow adequate time to adapt to that. |

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| | | • A voluntary self-assessment provided by jersey enforcement officers would help businesses to create a more effective safe food production environment.<br>In restaurant menus,<br>Having to provide nutritional panels are not practical as well as the QUID, because the restaurants will purely depend on their suppliers for this information.<br>If this is required for PPDS businesses, then it's up to those businesses to check how practical it is to provide these for the customers.<br>If the restaurants and cafes are expected to indicate artificial food colours Linked to hyperactivity in children, this will be a challenge for food businesses.<br>In restaurants, we use many different pre-made sauces and compounds that are bought to complete other in-house dressings and sauces. If what's bought in sauces doesn't have this information on the packaging it will be impossible to provide this information on food colouring.<br>To compile an allergen matrix responsibly that covers all listed 14 allergens is difficult enough in restaurants that has about 30 plus items in a menu, and if we also have to track other items like food colouring and if the food has been Irradiated or gone through "unusual processes" it will be extremely difficult to provide all these information to the customers.<br><br>We strongly agree with the principle of "Earned autonomy "with a records of compliance and to build confidence in our guests as well as the enforcement officers that we are always looking for ways to improve our hygiene standards. |
| 70 | As a member of the public | I have allergies that are not in the list of 14 allergens. |
| 71 | As a representative body/professional organisation | Farmers are already well regulated in food standards and pay for external audits such as Red Tractor and BRC. These audits are strict so adding another layer is just adds to cost and means more paperwork. The requirement for labeling will discourage local producers which counteracts good work being done by other government departments to encourage more local food production. Primary food producers should be left out of these Regulations. |

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| 72 | As a food business(email) | The States of Jersey is consulting on new food laws. Below are my comments and concerns<br><br>Introduction<br><br>Page 3 (last Para states):<br><br>1. "The tone is intended to be supportive, encouraging businesses to demonstrate a duty of care to their customers while continuously improving and maintaining high standards."<br><br>Question - Will Jersey enforcement officers be given trained to be supportive and encouraging? Concerned it will be 90% stick and 10% carrot with little support offered.<br><br>Section A<br><br>Page 7<br><br>1. Ensuring that consumers receive clear, accurate, and accessible information about the food they purchase – _including details on ingredients, allergens, origin, and nutrition.<br><br>Page 8 - Allergen Information Must Be in English<br><br>2. Proposal: Allergen information must be provided in English. Imported goods may use stickers or QR codes.<br><br>3. An exception in the draft regulations is proposed for temporary specialist markets, such as the Norman market operating under the Bailiff's permission.<br>Page 8 - Supporting Businesses and Protecting Consumers<br><br>4. Businesses that follow the new laws and accompanying guidance will be better protected in the event of an incident – demonstrating that they exercised due diligence i.e. they took all reasonable precautions to avoid the commission of the offence.<br><br>Questions |

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| | | 1. Will restaurants, cafes and indeed outside caterers be required to put full nutritional information on their menu's and if so will there be exemptions to this requirement similar to UK? Take the boat show as a test example here. How would that work?<br>2. Will there be flexibility for outlets serving mainly non-English speaking customers?<br>Are QR codes practical for all diners, especially elderly guests or those without smartphones?<br>What if products arrive into the kitchen or store without English labelling – do we have to reject them, or can we relabel on site?<br>Who will be responsible for relabelling – the supplier or the restaurant?<br>If UK law allows allergen info in another language as long as the customer understands it, why is Jersey being more strict?<br>3. Why are the Normandie markets exempt from requirements? France is part of the EU so they should already be complying with the labelling and allergen requirements? How will Gov make customers aware these markets are exempt?<br>4. Will Enforcement officers be trained in Reasonable Precautions, as opposed to "what I say goes?"<br><br>Page 10 - What This Means in Practice<br>Acceptable methods include:<br>1. Ingredient lists or recipe books available to staff<br>2. Saying "we don't know" when asked about allergens.<br>Using blanket disclaimers like "all our foods may contain allergens"<br><br>Questions<br><br>1. Ingredient list/recipe book. This is not currently required in UK, only an allergen matrix or allergens declared on menus. Why are we not following UK when 85% of our visitors are from there?<br><br>2. Clarify - Caterers need clarification on how to deal with "May Contain" declarations. These will be on ingredients used to make up meals and as such should caterer include these on their allergen matrix/information or not? They should perhaps be declared as this gives the customer the full and accurate information not either ignored or converted to a positive contain declaration. |

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| | | Page 13 - Supporting Businesses and Protecting Consumers<br><br>Charity Events and One-Off Sales<br>Proposal: Small charity or cultural events are exempt from labelling/licensing rules.<br><br>Questions to raise:<br><br>• If allergen rules don't apply at these events, are customers at risk?<br>• Shouldn't allergens at least be declared, as they are in the UK?<br>• Will this confuse the public, who expect allergen info everywhere?<br>• How will inspectors decide what counts as 'small scale'? For example, could a large charity dinner in a hotel fall outside these rules?<br><br>Page 14 -Imports Using 'Unusual Processes'<br><br>Proposal: Foods such as chlorine-washed chicken or hormone-treated beef could be sold if labelled.<br><br>Questions<br><br>• If these foods are banned in the UK and EU, why would Jersey accept them? Its runs the risk of damaging Jersey as foodie destination for visitors and locals<br><br>• This would likely undermine customer confidence in hotel and restaurant food?<br>• Will chefs and restaurants be expected to highlight this on menus if such products are used?- How will hotels manage guest expectations if visiting customers assume Jersey follows UK/EU standards?<br><br>Page 14 – New Labelling Requirements |

1. Nutritional declarations will be required (with exemptions for small businesses)
2. Quantitative Ingredient Declarations (QUID) must be used to show the percentage of key ingredients
3. Restaurants and cafés must indicate if food:

- Has been irradiated, and/or
- Contains any of six artificial food colours linked to hyperactivity in children

Questions

1. Nutrition Labels for Local Businesses

Proposal: Nutrition panels only required for Jersey businesses exporting off-Island.

- Does this mean local prepacked products (e.g. hotel grab-and-go sandwiches) won't need a nutrition panel?
- Visitors from the UK expect nutrition panels – won't they be confused if local products don't have them?
- Runs the risk of highlighting local producers as being below UK standards.
- Would it be better to have the same rules as the UK so that hotels and restaurants offering retail products are consistent with guest expectations?

2. Meat Content (QUID) on PPDS Foods

Proposal: Jersey may require meat content % (e.g. 'pork 80%') on PPDS foods like sausage rolls.

- Again, Why go further than UK law?
- How can hotels realistically calculate meat % in recipes without new software and printing equipment?
- Will chefs be expected to weigh and calculate every batch of burgers, sausages, and pies sold on site?
- Most head chefs in Jersey come from UK and will be trained and aligned to UK law.

3. In the UK colourings are not currently required for restaurants or cafes to declare the presence of in food? Will this be required in Jersey?

- Why are Jersey restaurants being asked to go further than UK law?
- Is there evidence diners are asking for this? Not in my experience.

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| | | • For hotels with large menus and changing specials, how practical is it to update menus every time a supplier changes an ingredient? Its expensive and impractical<br>• Could this lead to inconsistent enforcement, with some inspectors expecting it on menus and others not?<br>• Is this really necessary when allergens are already declared?<br><br>SECTION B – Food Hygiene & Safety<br>Page 18 - Training Requirements<br>1. To support this, the proposed regulations will require that food handlers receive specific training in food hygiene, with a particular but not exclusive focus on:<br><br>Questions<br>• Currently UK requires training commensurate with the job role which is usually Level 2 in Food Safety for food handlers and Level 3 in Food Safety for supervisors.<br>• Currently Jersey EHO's are asking for specific training on HACCP in addition to the above. In UK HACCP training is only expected in food manufacturing operations or for senior staff drawing up HACCP plans?<br>• Is the intention that every food handler – even casual or seasonal staff – will need HACCP training? Impractical and near impossible to achieve so doomed to failure.<br>• How will hotels manage this, given high staff turnover and reliance on temporary staff?<br>• Will Level 2 Food Safety certificates still be acceptable for basic staff?<br><br>Section C: Proposals for a New Licensing Scheme<br>1. Licensing and Annual Fees Page 14 - The Food (Jersey) Law 2023 includes provision for the Minister to introduce a new licensing scheme for food businesses, including the ability to raise fees.<br><br>Questions<br>Proposal: All food businesses must pay an annual licence (£200–£500 depending on risk). |

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| | | • In the UK registration is free – why should Jersey businesses face extra charges?<br>• This again adds an additional financial burden to catering businesses. This is simply another Government tax on catering businesses and we are on our Knees already.<br>• Will this include a yearly inspection by the States?<br>• If not, why are we paying this fee annually should it not be paid after a visit?<br>• Isn't food safety a public health responsibility that should be funded by taxation, not through an extra cost on caterers?<br>• For hotels/restaurants already paying high rents, rates and staff costs, what additional service are we receiving for this new licence fee?<br>• We must keep this simple and follow UK.<br>• Many businesses in Jersey already employ consultants to do quarterly audits of their sites. Should those paying for this this high standard service be exempt from any charges if the reports are available to Gov?<br><br>Page 18 - Food Safety Culture<br>Proposal: Businesses may be legally required to show a positive 'food safety culture.'<br><br>Question:<br>• How will inspectors measure 'culture'?- Will there be clear guidance and time to adapt, rather than expecting immediate compliance?<br>• Could inspectors give different opinions, leading to inconsistency across hotels and restaurants?<br>• Would a voluntary self-assessment tool or phased approach be more practical than making this a legal duty straight away?<br><br>In Summary,<br>Follow UK for simplicity<br>No Charges as industry cannot take any more currently. |

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| 73 | (Hard Copy) | Labelling Requirements & Allergen Information<br><br>*This comment relates to the section that says businesses may comply by providing QR codes linking to English language allergen information.*<br><br>"Not everyone has internet, how would the information be communicated to those who cannot scan a QR code?"<br><br>14 Allergens Table / Exceptions<br><br>*This comment refers to the table listing the 14 allergens and their exceptions.*<br><br>"Unsure why there are exceptions at all - consumers should be able to know exactly what is in a product whether it is food or drink."<br><br>Non-Pre-Packed (Loose) Food<br><br>*The question refers to the section stating a full ingredients list in not required for non-pre-packed foods.*<br><br>"Why?"<br><br>*These refer to the section discussing acceptable ways of providing allergen information (written, verbal, digital/QR).*<br><br>"Is this accessible to everyone? What about those who are blind?"<br><br>"Not accessible to those without smartphone/internet"<br><br>Distance Selling of Foods (Online / Phone Orders)<br><br>*These directly refer to the requirements for allergen information to be given at point of delivery, and the use of "may" instead of "must".* |

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| | | "Why only 'may be' provided in writing or verbally, why not 'must be'?"<br><br>"Is the delivery driver trained in allergen safe practices? Is there any language requirement for delivery drivers to speak English? What would be the process for a delivery driver to contact the kitchen if the customer has any queries?"<br><br>Comments Attached to Particular Questions<br><br>Charity Cake Sales / Cultural Events (Q8)<br><br>*This refers to the proposed exemption for one-off charity/cultural food events.*<br><br>"All food for public consumption should have to adhere to the same allergen laws"<br><br>Language Requirements for Food Labelling<br><br>*These comments relate to the sections discussing:*<br><br>• *non-allergen information being allowed in any language understood by the consumer, and (Q9)*<br><br>• *the proposed arrangements exemption for temporary international markets. (Q10)*<br><br>"If it's being sold in Jersey, the labelling information should be available in English as well as any other language"<br><br>"Any products being sold in Jersey should have to provide labelling in English as well as any other language"<br><br>Nutrition Labelling (Q11) |

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| | | *This refers to the section explaining that nutrition labelling would be required only for export products, not goods sold solely in Jersey.*<br><br>"Why does Jersey not follow the nutrition labelling laws in the first place?"<br><br>QUID (Quantitative Ingredient Declarations) (Q12)<br><br>*This refers to the consultation question on whether QUID is needed for PPDS items.*<br><br>"QUID should be required, small businesses also should know how much of each of their ingredients make their products."<br><br>Scope of Allergen Labelling (Q13)<br><br>*This refers to the section explaining that full ingredient & allergen labelling is required for PPDS, while other categories have different rules.*<br><br>"Allergen labelling should be included on all foods, not just PPDS."<br><br>ENDS |