

Introduction of Specific Approval for the production of burgers intended to be eaten less than thoroughly cooked

Food Standards Agency (FSA)

RPC rating: validated

Description of the measure

The sale and consumption of burgers less than thoroughly cooked (LTTC) has been steadily increasing in the UK. In February 2017, the FSA introduced a requirement for the specific approval of those cutting plants that supply burgers to catering outlets serving LTTC burgers. Three cutting plants already undertaking this activity were visited prior to the implementation date and granted approval once it had been verified that they had appropriate systems in place to minimise food safety risks. Any cutting plant wishing to enter the market in future will need to gain specific approval before production of burgers intended to be LTTC can commence.

Impacts of the measure

The assessment explains that there was a one-off cost to food business operators in becoming familiar with the approval process. This was estimated to take two hours of a production manager's time, at a wage rate of £30.65 per hour, including a 20 percent uplift for non-wage labour costs. This resulted in a total cost to business of £184 for the three approved cutting plants.

In addition, these businesses faced one-off costs as a result of completing the application form and undertaking the approval assessment. The FSA estimates it took ten minutes to complete the form, and four hours to undertake the assessment. At a wage rate of £30.65 per hour, the FSA estimates this imposed a total cost of £383 on the three businesses.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0.0 million. This is a qualifying regulatory provision.

Quality of submission

The FSA has provided proportionate evidence to support its estimate of the impact of the measure. The assessment should have included a discussion of the likelihood that more businesses will seek approval for this activity in the future and the potential impact on costs to business. However, it is unlikely that any assumed increase would

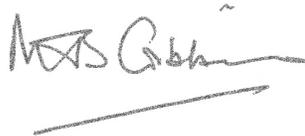
be significant enough to affect the rounded EANDCB figure. The assessment would also have benefitted from discussing whether the proposal has any implications for other types of meat (including Halal) that may be less than thoroughly cooked.

Regulator assessment

Classification	Qualifying regulatory provision
Equivalent annual net direct cost to business (EANDCB)	£0.0 million
Business net present value	£0.0 million

RPC assessment

Classification	Qualifying regulatory provision
EANDCB – RPC validated ¹	£0.0 million
Business Impact Target (BIT) Score ¹	£0.0 million



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANDCB and BIT score figures to the nearest £100,000.