

Official Food Standards and Feed Controls Service Plan

2018 – 2019

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1. Aims & Objectives

Our Service Vision

“Buckinghamshire and Surrey Trading Standards working together to protect our communities, delivering excellent public services, locally trusted and nationally recognised.”



Our Service Priorities

1. Protecting the most vulnerable, increasing the financial savings for residents, and stopping rogue traders operating in Buckinghamshire and Surrey.
2. Helping businesses to thrive and supporting economic growth: We will help businesses comply with their legal responsibilities and enhance public protection by expanding our chargeable business support services and increasing the number and impact of our business partnerships.
3. Improving wellbeing and public health; tackling the supply of unsafe or dangerous products and working to maintain the integrity of the food chain, including food quality and nutrition.

4. Enhance prevention through the use and reach of social media, TS Alert, volunteers, and other initiatives to raise awareness of scams, rogue traders and unsafe products.

5. Strengthen the sense of one service, embedding our values, supporting and developing our staff, to enable us to better protect residents and support businesses.

Our Service Performance Measures:

Protection - Protecting individuals, communities and businesses from harm and financial loss

The joint service will provide better protection for residents from consumer scams, cons, and rogue traders.

Performance measures:

1. To increase the financial savings for residents as a result of our interventions and investigations.
2. To protect residents by stopping rogue traders operating in Buckinghamshire and Surrey.
3. Prevent residents becoming victims through expanding the use and reach of social media alerts, TS Alert, Volunteers, and other preventative initiatives to raise awareness of scams, rogue traders and unsafe products.

Economic Prosperity - Helping business to thrive and supporting growth

The joint service will improve business advice and support, and as a result better protect residents.

Primary Authority and Assured Advice helps businesses, supports business growth, and helps protect residents by raising standards and improving compliance.

Trader approval schemes help promote good businesses and provide confidence for residents that they can avoid rogue traders.

Performance measures:

4. To increase the number of Primary Authority Partnerships
5. To increase membership of trader approval schemes

Improve Wellbeing and Public Health

The joint service will work with Public Health and others to tackle the problems caused by Tobacco, Alcohol, and poor nutrition.

Performance measure:

6. Work with partners to tackle illegal sales of age restricted products; to explore new ways to reduce harm from the use and consumption of unsafe products; and to tackle poor food quality and nutrition.

These aims and objectives align with the “Food Standards Agency Strategy for 2015-20 - Food We Can Trust” and the National Food Enforcement Priorities.

The work we carry out will support and help to deliver the four strategic outcomes for food work that the Food Standards Agency have identified as how they will measure the impact of the strategy.

- Food is what it says it is
- Consumers can make informed choices about what they eat
- Food is safe
- Consumers have access to an affordable healthy diet, now and in the future

For animal feed work we will ensure we follow the priorities identified in the FSA strategy, namely:

- Verification of the presence and accuracy of feed labelling particulars which have the potential to compromise human and/or animal health
- Validation of effective feed safety management systems at Annex II establishments with a focus on businesses supplying former foodstuffs or co-products
- Effective information sharing, communication and exchange of information and intelligence to support effective official feed controls
- Effective monitoring of consignments of feed originating from outside the European Union at points of entry
- Development of risk-based regional sampling programmes
- Effective identification and appropriate registration of food businesses operating at the level of primary production of food

2. Background

The service covers the geographical areas of Buckinghamshire and Surrey

Surrey background

Surrey is the most urbanised shire county in England with 83% of inhabitants living in urban areas and yet 73% of land in Surrey is green belt and 25% is designated as Areas of Outstanding Natural Beauty.

The County of Surrey is one of the most densely populated shire counties and is strongly influenced by its proximity to London. 85% of housing is in 15% of the county. 85% of the county is countryside, of which 38% is still farmed. Although Surrey is an affluent area, with earnings being 42% higher than the national average, it has areas which are disadvantaged and can be overlooked if specific measures are not taken. Business diversity is great, although there is little in terms of heavy industry.

The population of Surrey is predicted to be 1,190,000 in 2017.

Buckinghamshire background

Buckinghamshire is a large rural county of 156,509 hectares close to London. The population is estimated to grow to 536,454 by 2018 from 516,096 in 2013.

The county is one of contrasts - the north is predominantly rural, with small market towns, whilst the south is more urbanised. The two largest centres of population are urban areas encompassing the towns of Aylesbury and High Wycombe, with total populations of 69,000 and 77,000 respectively. These urban areas accommodate nearly 40% of the total population. Over a quarter of Buckinghamshire is included within the Chilterns Area of

Outstanding Beauty and a further third is protected as Metropolitan Green Belt, mostly in the south of the county. Within rural areas agriculture is the predominant land use, over 70% by area.

Business and the economy

We have established 44 Primary Authority relationships with food and feed related businesses and organisations and continue to raise awareness of this opportunity with other appropriate businesses.

Both Buckinghamshire and Surrey are areas of light industry and high commercial development. There are comparatively few large manufacturing premises but we have the administrative and decision making offices of some very substantial national and international food companies within the areas. These include such companies as Waitrose, Premier Foods, Dairy Crest, Kerry Foods and Hill's Pet Nutrition.

There are a significant number of transient Importers of foodstuffs whom change at regular intervals in Surrey due to the proximity of the London airports.

Service background

Responsibility for food enforcement is shared between two tiers of local government - County Councils and District/Borough councils, of which there are four in Buckinghamshire and eleven in Surrey.

Liaison groups in Buckinghamshire and Surrey have representatives from each authority and there are forums to ensure appropriate coordination and cooperation on food issues. They meet regularly, every quarter.

Trading Standards is responsible for food standards, which includes food composition, ingredients and labelling of food. The District and Borough Councils' Environmental Health services are responsible for matters of food safety, hygiene, cleanliness and the food borne causes of illness.

3. Demands and Prioritisation

In 2017-18, 161 complaints and requests for advice were received across the service about food and feed issues.

Those food contacts that are not acted upon directly are noted for potential future use as intelligence, which is taken into account when planning proactive work.

In addition to this reactive demand, the Service carries out a similar proportion of proactive work in this area, which is described further in the Food Surveys and Projects section. This year we will carry out visits to all premises assessed as high risk. It should be noted that the projects will also involve a variety of interventions such as visits and sampling.

We will also carry out the feedingstuffs visits and sampling that have been agreed as part of the National Trading Standards regional coordinated work in line with the priorities in the FSA National Enforcement Strategy. These help to deliver the necessary interventions that nationally help to guarantee food and feed exports.

For feed premises we will prioritise work on:

Priority 1

We will

- a) Identify Feed Business Operators (FeBO's) offering feed for sale by means of distance communication, ensuring they are appropriately registered and/or approved and are providing mandatory labelling particulars as required by Article 11(3) of Regulation (EC) No 767/2009 on the placing on the market and use of feed;
- b) Verify the accuracy of claims as set out in Article 13 of Regulation (EC) No 767/2009;
- c) Ensure instructions for use are adequate and appropriate to avoid exceeding feed additive MPLs;
- d) Ensure information supporting traceability, in the event of a feed safety incident, is present and accurate;
- e) Ensure labelling and presentation of feed does not mislead the user;
- f) Verify that feed materials included in the EU register are appropriate for use, as such, and report any suspected non-compliance to the FSA; and
- g) Verify that additives present in feed are authorised in line with Regulation (EC) No 1831/2003 on additives for use in animal nutrition.

Priority 2

We will

- a) Give priority to identifying food and drink manufactures as well as retailers involved in the supply of co-products and/or former foodstuffs (surplus food) into the feed chain and include these in their intervention and sampling programmes through regular liaison with LAs in their area responsible for keeping registers of food business establishments (FBOs) under Article 6(2) of Regulation (EC) No 852/2004 on food hygiene;
- b) Ensure interventions at businesses involved in the supply of co-products and/or former food stuffs includes the examination of documented feed safety management systems (HACCP plans where they are used), paying particular attention to:
 - The identification of control points to ensure that material is suitable for use as animal feed and does not include items such as meat, fish and shellfish (and products containing them or have been in contact with);
 - That appropriate segregation is in place with material not intended for use as feed;
 - The existence of a recorded training programme for staff in charge of dealing with former foodstuffs;
 - That the material is being supplied to a registered feed business establishment ;
 - Where the material is a former foodstuffs containing food grade packaging intended for use in feed, that the material is to undergo further treatment at a feed business which specialises in the removal of packaging from surplus food;

and in the case of processors of former foodstuffs into feed that their suppliers and hauliers are all registered as feed businesses

Priority 3

We will

- a) Proactively share with, and report to, the National Food Crime Unit (NFCU) all of the intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases;
- b) In England only, comprehensively complete the National Trading Standards bi annual reports about imported and inland feed activity;
- c) Proactively implement the feed hygiene Memorandum of Understanding between the Veterinary Medicines Directorate (VMD) and the Animal Plant Health Agency (APHA) in England and Wales which supports an intelligence led, risk-based approach to enforcement, prevents duplication of work and aids effective use of resources; and
- d) Ensure their databases accurately reflect all activities undertaken by feed business establishments and that these establishments are appropriately registered, in consideration of Food Standards Agency and Association of Chief Trading Standards Officers guidance on:
 - Registration, amendment and revocation of Feed Business Operators under Regulation (EC) No 1831/2003; and
 - Top tips for managing local authority feed databases

Priority 4

We will ensure that

- a) All sampling takes account of previous results of analysis carried out at feed businesses and Feed Business Operators own sampling and analysis;
- b) Feed materials rather than compound feed are prioritised for testing for the presence of undesirable substances, unless there is good reason to believe systems in place to prevent contamination during the production of the feed are not effective

Priority 5

- a) The identification and correct classification of activity of higher risk 'ready to eat food' business establishments operating at the level of primary production in their area. For 2018-2019 these are producers of micro leaves, baby leaves, herbs, watercress, lettuce, spinach, strawberries, salad onions, radishes, celery, chicory, in consideration of FSA guidance; and
- b) Ensuring that LA databases accurately reflect the activity undertaken by Food Business Operators (FBOs) and that these establishments are appropriately registered

Profile of food premises in Buckinghamshire and Surrey

Total business premises	72 539
Total food premises	9581
Food manufacturers/importers/packers	285

Profile of feed premises in Buckinghamshire and Surrey

On farm mixers:	
Mix Feeds on Farm with additives and premixes	96
Mix Feeds on Farm with compound feeds containing additives	175
Feed producers:	
Manufacturer &/or place on the market – Feed Additives	4
Manufacturer &/or place on the market – Nutritional Additives	0
Manufacturer &/or place on the market – Feed Materials	129
Others:	
Livestock Farm not mixing or mixing without additives	748
Placing on the market of Compound Feeds	45
Transport of Feed & Feed Products	19
Storage of Feed & Feed Products	19
Arable Farm growing or selling crops for feed	113

Of these Food premises 41 are High Risk; 161 are Upper Medium Risk; 1701 are Low Medium Risk and 5736 are Low Risk (the remainder will be unrated).

Of the feedingstuffs premises the National Trading Standards Board risk methodology which determines the categories of premises we should visit has shown that we will need to visit 67 premises.

We have the resources to carry out these premise visits required and they will be funded by the Food Standards Agency. An ongoing challenge is to ensure our database properly reflects the impact our work has on the inspection risk posed by the businesses and if the businesses are members of earned recognition schemes as such status will reduce the need to visit them. We have been working with representatives from the FSA to understand how we can do this and are already making progress on improvement.

4. Liaison with other organisations

We work in partnership with:

- Other parts of the County Councils, in particular our colleagues in Public Health
- Central Government Agencies with responsibility for food standards (DEFRA; Food Standards Agency and Department of Health)
- Chartered Trading Standards Institute

- District Councils
- Business organisations
- Trading Standards South East Liaison Group
- Other Local Authorities
- Food Liaison Groups
- Other charitable organisations such as the Coeliac Society and Allergy UK
- Earned recognition schemes such as Red Tractor.

5. Food and feedingstuffs safety and standards promotion

Our publicity programme will be targeted at publicising the findings of our work on issues impacting on the health, nutrition and economic welfare of consumers and providing both consumer and business education.

We carry this out by:

- Attending and participating in appropriate Community events, seminars and exhibitions.
- Using social media
- Issuing regular press releases and participating in interviews with the media
- Promoting and taking part in national and local campaigns
- Static displays around the service area
- Giving talks to consumers and businesses when appropriate
- Attending and participating in appropriate meetings and workshops

6. Food surveys & projects

Each year officers undertake various projects where: information is gained that can usefully assist consumers to make informed choices; or to protect the functioning of the market and help businesses improve their products

In 2017-18 the following are examples of projects that were undertaken:

- Allergens in catering establishments
- Supporting local food producers to be compliant
- Supporting business and helping consumers to make informed choices by ensuring that food is labelled in English
- Volunteers supported sampling projects to assess histamine levels in fish products, inorganic arsenic in rice products, authenticity of olive oil and possible substitution of peanuts for cashew products.

Projects for 2018-19 will be:

- Looking at local food producers and products to ensure compliance is achieved
- Continuing to work with the catering sector to ensure allergen issues are dealt with appropriately

- Looking at food supplements online to assess levels of compliance and take appropriate interventions to improve the market place
- Assessing the ability of food businesses to show the traceability of food to ensure the food chain is able to maintain consumer and business confidence
- Continuing to support food businesses to provide food information in English
- Supporting targeted projects in partnership with our Public Analysts in Kent and Hampshire

7. Organisational structure

Buckinghamshire and Surrey Trading Standards Service is governed through a Joint Committee comprising of the relevant Cabinet Members from both partner authorities. The Service also has an advisory Board comprising of councillors and senior managers from each authority. The legal framework for the Service is set out in an Inter Authority Agreement.

The service operates from two locations, one in Aylesbury and one in Redhill.

8. Enforcement information

The Service has a documented Enforcement Policy - this is available on our website: <https://www.surreycc.gov.uk/business-and-consumers/trading-standards/trading-standards-policies-and-plans/trading-standards-enforcement-policy> .

9. Quality assessment

The joint service is establishing work systems and practices that will enable the best outcomes to be delivered.

The Aylesbury office has an operational approach based on ‘systems thinking’ and officers follow the principles established by this method, which focus on the customers’ needs and ensuring that the flow of work is as smooth as possible to cut out unnecessary work (waste) and be as efficient as possible.

The Redhill office operates internal quality procedures and work guidance which are monitored internally.

10. Review against 2017– 2018 plan

The activities identified in the 2017-18 plan have been delivered.

We have taken part in the Food Standards Agency / National Trading Standards funded feedingstuffs visits and sampling work and delivered the work we agreed we would.

We have also been working with the Food Standards Agency to improve the accuracy of our database and we are working with them to produce national guidance notes to support other authorities.

11. Resources

Officers (FTE equivalent)	Food work	Feedingstuffs work	Totals
Operational	6.4	0.56	6.96
Managerial	0.5	0.04	0.54
Support	0.1	0.05	0.15
Totals	7.0	0.65	7.65

Costs	Food work	Feedingstuffs work	Totals
Staff costs (including overheads)	£329,690	£32,686 (funded via NTS and FSA)	£362,376
Project and sampling costs	£50,000	£21,120	£71,120
Total costs	£379,690	£53,806	£433,496

12. Staff development plan

Authorised food and feed officers are qualified in accordance with Food Standards Agency Food and Feed Codes of Practice.

We operate a staff appraisal scheme and managers work closely with officers to enable us to identify training needs and provide ongoing training. These needs may be met by coaching within the day to day work and external formal provision. All officers are members of the Chartered Trading Standards Institute (CTSI) and as such undertake CPPD which is CTSI verified.

Where significant changes to food or enforcement law and food technology occur relevant training will be identified and provided by one of the means above.