

Official Food Standards and Feed Controls Service Plan

2024 – 2025



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1. Aims & Objectives

Our Service Priorities

The Trading Standards service exists to:

- protect individuals, communities and businesses from harm and financial loss
- help businesses to thrive by maintaining a fair trading environment
- improve the health and wellbeing of people and communities
- fulfil our statutory responsibilities to deliver consumer and public protection services across Buckinghamshire and Surrey

Our key actions: We will support the delivery of Buckinghamshire Council's strategic aims, and the Community Vision for Surrey in 2030.

1. Protecting the most vulnerable. Tackling fraudulent, illegal and unfair trading practices with a particular focus on disruptive activities.

2. Enabling businesses to get the help and support they need to thrive and grow. Delivering public protection through supporting businesses to comply with their legal responsibilities and ensuring a level playing field.

3. Improving wellbeing and public health; tackling the supply of unsafe, dangerous or age restricted products and working to maintain the integrity of the food chain from farm to fork, including food quality, nutrition, and animal health.

4. Actively promoting and contributing to a culture that generates a positive and inclusive environment and empowers the workforce, communities, and residents.

These aims and objectives align with the Food Standards Agency (FSA) Strategy for 2022-27 which is **food you can trust**.

This means that:

- Food is safe
- Food is what it says it is
- Food is healthier and more sustainable

The work that we do will help support and deliver these outcomes within Buckinghamshire, Surrey and nationally through our Primary Authority Partnership work.

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

Priority 1: Verification of effective implementation and maintenance of feed safety management systems

Priority 2: Effective monitoring of feed on farms

Priority 3: Effective monitoring of storage arrangements at feed premises

Priority 4: Verification of the accuracy of feed labelling

Priority 5: Effective monitoring of consignments of feed originating from non-EU countries, at points of entry

Food Hygiene Primary Production Priorities:

Priority 6: Effective identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production

2. Background

The merged service was created in 2015 and is managed by a Joint Committee which comprises Cabinet Members and Directors from both authorities.

The service covers the geographical areas of Buckinghamshire and Surrey although our Primary Authority Partnerships include businesses that have bases nationwide.

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 in 2021 was 1,203,108.

Buckinghamshire background

Buckinghamshire (excluding Milton Keynes) is a large rural county of 156,509 hectares close to London. The population was 553,100 in 2021.

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 around 88,000 and 83,500 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 93 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 Coca Cola, Waitrose, Premier Foods, Hovis Limited, Dairy Crest, Kerry Foods and Hill's Pet Nutrition. We also have partnerships with trade associations such as the Association of Convenience Stores and Health Food Manufacturers Association.

There are a significant number of transient importers of foodstuffs who 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 Council, Unitary and District/Borough councils. Buckinghamshire became a unitary authority in 2020 and Surrey has eleven district/borough councils.

Food 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 Unitary, 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 2023-24 240 complaints and requests for advice were received across the service about food and feed issues

These food contacts will be considered in the context of the risk rating of the food business. If the risk remains the same the contact will be noted as intelligence.

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 plan to carry out interventions for food businesses assessed as being due an intervention before April 2025. 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.

Profile of food premises in Buckinghamshire and Surrey

The service has participated in the Food Standards Agency pilot scheme to develop the risk scheme that is now part of the Code of Practice. The scheme changes the way we are able to assess when food businesses need an intervention. A big difference is that risk can be changed within year to reflect increased risk and need for an intervention. The risk can be changed if we receive information, for instance a complaint about an allergen issue, that makes the risk to the marketplace higher and the scheme indicates when the intervention should be made. This means that our risk profile will undoubtedly change in year and the anticipated intervention profile will change accordingly. The indicated profile in the plan is a snapshot of anticipated risk and sometimes we will need to reprioritise our interventions. The risk matrix with intervention expectation is below. The Food Standards Agency are working with our information database provider to embed the new scheme into our electronic database but whilst this is under development we are using spreadsheets to identify our interventions.

Inherent Risk Profile	5	12 Months	24 Months	60 Months	72 Months	120 Months
	4	Priority Intervention 6 Months	12 Months	36 Months	48 Months	72 Months
	3	Priority Intervention 6 Months	12 Months	24 Months	36 Months	60 Months
	2	Priority Intervention 3 Months	Priority Intervention 6 Months	12 Months	24 Months	36 Months
	1	Priority Intervention 1 Month	Priority Intervention 3 Months	Priority Intervention 6 Months	12 Months	24 Months
		1	2	3	4	5
Compliance Assessment						

As at 1st April 2024:

Number of Food Businesses	22,383 (We are averaging 120 new food businesses a month)
Number of Manufacturers, Importers, Packers, and Processors	339
Number of Food Businesses due an intervention in 1 month	61
Number of Food Businesses due an intervention in 3 months	41
Number of Food Businesses due an intervention in 6 months	20
Number of Food Businesses due an intervention in 12 months	1288

Profile of feed premises in Buckinghamshire and Surrey

- 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 114 premises. Of the 92 inland inspections

and 22 high risk food primary producer businesses, 20 will be carried out by our officers, and 94 will be carried out by the Trading Standards South East (TSSE) contractor/s. Of the 12 farm-based premises all 12 will be carried out by our officers.

We have the resources to carry out the feedingstuffs visits as they will be funded by the Food Standards Agency.

4. Liaison with other organisations

We work in partnership with

- Other parts of the 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
- Buckinghamshire Environmental Health
- District Councils
- Business organisations
- Trading Standards South East Food & Feed Focus Groups
- 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
- Giving talks to consumer and business groups and organisations when appropriate
- Attending and participating in appropriate meetings and workshops at both local and national level

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 achieve compliance.

In 2023-24 the following are examples of projects that were undertaken

- Saturday Night - Artificial colours in Indian takeaway dishes – found 47% contained non permitted colours – Ponceau 4R and Sunset yellow – not permitted in sauces
- Breaking Bad - Deoxynivalenol (DON) in wheat flour – 12 were tested, all were satisfactory in relation to DON, however 10 had unsatisfactory labelling with 4 due to lack of or incorrect allergen labelling
- Grotty Grains – Looking for mycotoxins in maize cereals – all satisfactory, some labelling non compliances

Issues that could affect consumers health

- Checking levels of lead in milk
- Checking the nutrition accuracy and claims of canned fruit & vegetables and to assess against current guidelines and legislation.
- Determining the levels of mycotoxins, specifically aflatoxin, zearalenone and deoxynivalenol, in breakfast cereals
- Checking for the presence of artificial colours in ethnic takeaway meals
- Checking the deoxynivalenol levels in wheat flour
- Surveying food samples for gluten content and to assess for compliance with legislation concerning the use of “Gluten Free” labelling
- Testing samples of fresh or frozen fish, shellfish, or meat for amphenicols, nitrofurans and tetracyclines

Issues that could potentially mislead consumers when buying food

- Testing the alcohol content of beer/cider samples produced by small scale independent breweries
- Checking for extraneous water in whole frozen chicken and frozen poultry cuts

Overall most samples were compliant for levels of substances that could cause harm. More common were minor labelling issues that depending on the risk posed were taken up with the food business or noted for intelligence purposes.

Projects for 2024-25 will be:

“Groundnut Day”- to establish if aflatoxins are present in retail samples of peanut butter and peanut products. If present, levels will be quantified to determine if the sample is harmful to health.

“Manky mince”- to evaluate level of fat, collagen: meat protein ratio and meat species of minced meat

“Oil rigged” - To sample food oils and cooking oils to check the fat profiles and assess whether any substitution may have taken place. Fat related nutrition and health claims will also be assessed based on the analysis. (request additional test for Extra Virgin Olive Oil)

“Double Glazed” - to establish the presence or absence of milk and/or egg allergens in both prepacked and non-prepacked foods which do not declare the presence of these allergens

“How nice is your Spice?” - to establish if the mycotoxins Aflatoxin and Ochratoxin A are present in samples of spices. If present, levels will be quantified to determine if the sample is harmful to health.

“Pre-packed peril” - To look at prepacked for direct sale foods, particularly (but not limited to) bread and bakery products, for the presence of undeclared milk, sesame and soya

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 Reigate.

8. Enforcement information

The Service has a documented Enforcement Policy - this is available on our website: [Trading Standards enforcement policy - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/trading-standards-enforcement-policy) .

9. Quality assessment

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

Officers have regular meetings with their team supervisors when their work is reviewed. Regular team meetings review food issues and suggestions for improvement.

10. Review of 2023– 2024 activities

All 10 Hampshire and Kent Public Analyst projects we committed to were delivered and non-compliances addressed with the relevant food businesses.

The Service took part in a Food Standards Agency targeted sampling project looking at imported American snack foods.

The Service carried out 166 interventions prioritised using the new risk scheme (this excludes informal sampling or test purchase visits). However, the incoming intelligence meant we needed to adjust the food businesses that were then assessed to pose greater risk and prioritise these, leaving some interventions to be carried forward to this year.

We successfully prosecuted a food business in Surrey for failing to comply with an improvement notice. The notice was served as the business were not providing proper information about allergens and placing consumers at risk despite repeated advice. The business is no longer trading.

[Trading Standards crack down on Dorking Royal Chicken and Pizza shop for poor allergen labelling | Leatherhead Living \(wordpress.com\)](#)

[Dorking takeaway fined for 'dangerous' restaurant practices and told to pay £3k - Surrey Live \(getsurrey.co.uk\)](#)

We served a compliance notice on a business that was marketing a food that was classed as novel in that it was new to the marketplace and as such need to have Food Standards Agency approval. This approval had been sought and the application was rejected but the business continued to supply the product. After serving the notice the business has ceased supplying the product.

11. Resources for 2024/25

Officers (FTE equivalent)	Food work	Feedingstuffs work	Totals
Operational	3	0.56	3.56
Managerial	0.5	0.04	0.54
Support	0.1	0.05	0.15
Totals	3.6	0.65	4.25

Costs	Food work	Feedingstuffs work	Totals
Staff costs (including overheads)	£184,000	£32,400	£216,400
Project and sampling costs	£30,000	£6,245	£36,245
Total costs	£214,000	£38,645	£252,645

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 performance conversation 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 or through 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.