

Meeting of:	Shared Regulatory Services Joint Committee
Date of Meeting:	Tuesday, 27 September 2022
Relevant Scrutiny Committee:	Homes and Safe Communities
Report Title:	Shared Regulatory Services Food and Feed Law Enforcement Service Plan 2022/23
Purpose of Report:	To seek approval for the Food and Feed Law Enforcement Service Plan for the Shared Regulatory Service for 2022/23
Report Owner:	Director of Environment and Housing Services
Responsible Officer:	Head of Shared Regulatory Services
Elected Member and Officer Consultation:	No Elected Members have been consulted.  The following officers have been consulted; Assistant Director, Cardiff Council, Chief Officer Legal, Regulatory and Human Resources, Bridgend County Borough Council
Policy Framework:	This is a matter delegated to the Joint Committee
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#### **Executive Summary:**

 The report apprises the Committee of the work of the Shared Regulatory Service in respect of Food and Feed law. The report requests the Committee to approve the Food and Feed Law Enforcement Service Plan for the Shared Regulatory Service for 2022/23.

#### Recommendations

- **1.** Approve the 2022/23 Food and Feed Law Enforcement Plan.
- 2. Authorise the Head of the Shared Regulatory Services to make administrative amendments to the 2022/23 Food and Feed Law Enforcement Service Plan should the need arise.

#### **Reasons for Recommendations**

- 1. The Food Standards Agency requires all Local Authorities to produce and approve an annual plan that sets out how it will discharge its statutory responsibilities under the relevant legislation
- 2. To ensure the plan remain up to date should any changes in law or best practice be introduced during the period.

#### 1. Background

- 1.1 The Councils have a duty, which has been delegated to the Joint Committee, to enforce the Food Safety Act 1990; the Official Food and Feed Controls (Wales) Regulations 2009 and a wide variety of other food / feed legislation including the Food Hygiene (Wales) Regulations 2006.
- 1.2 As part of the Food Standards Agency's Framework agreement the Councils are required to produce a Food Safety Service Plan setting out the arrangements in place to discharge these duties. This Food and Feed Law Enforcement Service Plan is produced in response to that requirement and is designed to inform residents, businesses and other stakeholders in the region of the arrangements the Councils have in place to regulate food safety.
- 1.3 A copy of the draft Food & Feed Law Enforcement Service Plan for 2022/23 for the Shared Regulatory Service has been attached to this report as Appendix 1.
- 1.4 The Service Plan details how the Shared Regulatory Service will fulfil the major purpose of ensuring the safety and quality of the food chain to minimise risk to human and animal health.
- 1.5 To achieve this, the Councils will conduct inspections in accordance with the intervention programme, carry out investigations including dealing with complaints, provide advice/education and provide guidance on what the law requires, undertake sampling and take enforcement action where appropriate.

- 1.6 The plan details the demands on the service, the risk based work programme and the resources available to deliver the required work. As with many other Council services the service faces increasing demands with reducing resource.
- 1.7 It should be noted that this year's work programme differs to the usual format due to the requirement of the Food Standards Agency Covid Recovery Plan. SRS officers have met with FSA officials to discuss the challenges faced by the service in respect of the large number of premises requiring visits and the consequence of a larger than expected number of interventions as the economy has reopened.
- **1.8** The plan explains the Food Standards Agency expectations of Local Authorities, some of the achievements in 2021/22, and the challenges for the year ahead.

#### 2. Key Issues for Consideration

- 2.1 The Food Standards Agency framework agreement sets out the expectations placed upon local authorities and their delivery of official controls on feed and food law. The agreement sets out the planning and delivery requirements of feed and food official controls, based on the statutory code of practice.
- 2.2 A requirement within the framework is that local authorities carry out interventions at all food hygiene, food standards and feeding stuffs establishments in their area at specified frequencies. As indicated in 1.7 above meeting this requirement in the 21/22 period has been, and continues to be impacted by the coronavirus outbreak and SRS's response to the pandemic.
- **2.3** The Food Standards Agency has the power to inspect local authorities to determine the Council's performance against the standard.

# 3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1 The Well-being of Future Generations Act requires the SRS to underpin decision making by contributing to the seven well-being goals of the Act, following the five ways of working, and consequently undertaking actions that will have a positive impact on people living in the future as well as those living today. Consequently SRS seeks to work in the following ways:
  - Looking to the long term
  - Taking an integrated approach;
  - Involving a diversity of the population in the decisions affecting them;
  - Working with others in a collaborative way to find shared sustainable solutions
  - Acting to prevent problems from occurring or getting worse.

#### 4. Climate Change and Nature Implications

- **4.1** As set out in 1.1 above, one of the key strategic themes for the Shared Regulatory Service is *Protecting the Local Environment*.
- 4.2 The SRS Business Plan articulates the work carried out under this theme to deliver on the corporate priorities for the participant Councils, including their ambitions to minimise climate change and impacts on the natural environment.
- 4.3 In this context, the Joint Committee is regularly updated on the contribution of SRS to this agenda, for example through its work in the areas of animal health and welfare, air quality, contaminated land, energy efficiency in the private rented sector and investigating greenwashing claims or environmental fraud.

#### 5. Resources and Legal Considerations

#### **Financial**

5.1 The Participants' contribution towards the Shared Regulatory Service is recharged on a quarterly basis, based upon the approved budgets for 2022/23. Accounting for the full year is reported to the Committee at the Annual General Meeting.

#### **Employment**

**5.2** There are no immediate employment implications associated with this report.

#### **Legal (Including Equalities)**

5.3 Under Section 41 of the Food Safety Act 1990, as amended by paragraph 18 of Schedule 5 of the Food Standards Act 1999, the Food Standards Agency can require Food Authorities to provide them with reports and information regarding the Authorities enforcement of the Act. Local Authorities are required to supply them with statistical information on inspections, prosecutions, official samples and informal samples.

#### 6. Background Papers

• Appendix 1 Draft Food and Feed Law Enforcement Service Plan 2022/23.

# **Shared Regulatory Services**

Food Hygiene and Standards

Food and Feed Law
Service Plan
2022/23











# Introduction

Shared Regulatory Services (SRS) is a collaborative service formed between Bridgend, Cardiff and the Vale of Glamorgan Councils on 1<sup>st</sup> May 2015. The SRS delivers a fully integrated service under a single management structure for Trading Standards, Environmental Health and Licensing functions with shared governance arrangements ensuring full elected member involvement.

Local authorities have a duty to enforce the Food Safety Act 1990, the Official Food and Feed Controls (Wales) Regulations 2009 and a vast array of food and feed legislation including the Food Hygiene (Wales) Regulations 2006 and as part of the Food Standards Agency's Framework Agreement are required to produce a Food and Feed Service Plan setting out the arrangements it has in place to discharge this duty. This Food and Feed Law Enforcement Service Plan, is produced in response to that requirement and is designed to inform residents, the business community and the wider audience, of the arrangements Bridgend, Cardiff and the Vale of Glamorgan has in place to regulate food and feed safety. It also shows how these activities contribute to and support others in delivering corporate objectives to the community as a whole.

The Service Plan details how the Food and Feed Service will fulfil the major purpose of ensuring the safety and quality of the food chain to minimise risk to human and animal health. To achieve this, officers from the Shared Regulatory Service will provide advice, education and guidance on what the law requires, conduct a programme of interventions, investigations, sampling and take enforcement action where appropriate. This Plan is therefore designed to both meet the requirements laid down by the Food Standards Agency and to clearly show how through encouragement, regulation and enforcement, food and feed safety will be delivered across the region and identifies the resources available to do this.

As we enter the new financial year, we do so mindful of the Covid-19 pandemic that during the last 2 years has placed significant challenges on the delivery of food and feed controls across the region. Going forward, the risks associated with the virus are still very much with us and we recognise the need to continue to adapt as the situation evolves and are realistic in acknowledging that our priorities and plans may change as the year progresses.

This service plan therefore outlines our current arrangements and proposed interventions and actions to be delivered during the year. Whilst these may be subject to change, we remain committed to protecting and improving the health of people across the region.

Any deviations from the plan will be done in accordance with guidance provided by the Food Standards Agency. We will also ensure our approach to enforcement is risk based and will ensure that stakeholders are kept updated of our intentions and progress.

Christina Hill
Operational Manager Commercial Services

# 1. Service Aims and Objectives

# 1.1 Aims and objectives

The Food and Feed Safety Service is committed to improving the safety and quality of the food chain and to demonstrate this, the Service has adopted the following aims and objectives.

The overall aim of the Service is to:-

Protect public health by ensuring that food for human or animal consumption is without risk to the health and safety of consumers, and is labelled and described accurately.

To achieve this, the service has adopted the following 12 key delivery priorities:-

- Meet the 'The Standard' outlined in the Framework Agreement on Local Authority Food Law for enforcement of food hygiene, food standards and/or feed legislation.
- Ensure that all food and feed premises receive an intervention in accordance with relevant statutory codes of practice.
- Investigate food and feed complaints.
- Develop Primary Authority partnerships with businesses and respond to enquiries from other enforcing authorities.
- Provide advice to consumers and business on food and feed matters and respond to all enquiries for service within specified target times.
- Maintain an adequate food and feed inspection and sampling programme.
- Ensure that food and feed imported into the European Union through the Port of Cardiff, Barry and Cardiff International Airport meet legal requirements and are subject to checks.
- Control and investigate sporadic and outbreak cases of food poisoning and food related infectious disease.
- Investigate, initiate and respond to food alerts and incidents.
- Work with other food and feed authorities and professional bodies to ensure consistency of food and feed safety enforcement.
- Promote food and feed safety and standards.
- Take appropriate enforcement action proportionate to the degree of risk to public health and in accordance with the Food Hygiene Rating Scheme.

## 1.2 Links to Corporate Objectives and Strategic Plans

As a regional organisation providing regulatory services across three local authority areas, we place the **corporate priorities** and outcomes of the three councils at the heart of all that we do (Appendix D). In developing our own strategic priorities and outcomes for Shared Regulatory Services (Appendix E), we have considered the priorities of all the three authorities, together with the needs and aspirations of our partners and customers so they translate into priorities that meet local needs.



SRS priorities particularly relevant to the delivery of the food and feed controls are:-



Amongst other factors impacting on health, the quality of the food we eat, the standards to which it is produced and the environment in which it is prepared, are central to people's health.

Food hygiene and food standards enforcement strives to ensure that food and drink is accurately described and labelled, meets the required food standards and is prepared in a safe environment. Food hygiene controls and inspections seek to minimise the risk to consumers of food borne infection.

Safeguarding the vulnerable The role of the food service plays a vital part in safeguarding the vulnerable, particularly in relation to educational and care homes settings. Good nutrition and safe food are essential to everyone's short and long term health and wellbeing

which is further enhanced in terms of vulnerable adults and children. The enforcement of food regulations ensures that food provided in these settings are safe, therefore protecting our vulnerable residents.

Supporting the local economy

The provision of timely advice and guidance on food safety and food standards legislation can benefit the economic viability of businesses. Failure of a food producer to correctly label foods can, for example lead to costly re-labelling of

inaccurately described foods and it is essential for producers to be fully acquainted with the legislation that applies to their products and the hygiene standards they need to comply with when producing the food. The equitable enforcement of regulations helps to maintain a level playing field, allowing businesses to compete on equal terms.

Nationally the service also contributes to the **National Enforcement Priorities for Wales** for local regulatory delivery which highlight the positive contribution that regulatory services, together with local and national partners, can make in delivering better outcomes:-

- Protecting individuals from harm and promoting health improvement
- Ensuring the safety and quality of the food chain to minimise risk to human and animal health
- Promoting a fair and just environment for citizens and business

• Improving the local environment to positively influence quality of life and promote sustainability.

The Local Public Health (medium term) Plan 2020-2023 - Published as part of the Local Public Health Strategic Framework the Local Public Health Plan provides details of how local Public Health teams work in partnership to improve and protect the health and well-being of the local population. The Plan sets out several priority work areas and actions necessary to achieve improvement which the Food and Feed Service contribute to through its various activities.

# 2. Background

## 2.1 Area profile

Shared Regulatory Services covers the Council areas of Bridgend, Cardiff and the Vale of Glamorgan and serves over 650,000 residents. Extending from St Mellons in the east to Maesteg in the west, the area encompasses Cardiff, the capital City of Wales with its array of cultural, financial and commercial organisations and the rural areas of Bridgend and the Vale of Glamorgan with their vibrant tourist and agricultural economies.

Bridgend is situated on the south coast straddling the M4 corridor. It comprises an area of 28,500 hectares and a population of just over

140,000 residents. To the north of the

M4, the area consists of mainly ex-coal mining valley communities with Maesteg as the main centre of population. To the south of the M4, the ex-market town of Bridgend is the largest town, the hub of the economy and its employment base. To the south west on the coast lies Porthcawl, a traditional seaside resort, with a high proportion of elderly residents, which is subject to a major influx of tourists during the summer period.



Cardiff is the capital city of Wales and is continuing to grow faster than any other capital city in Europe. In population terms, it is the largest city in Wales with a population of 370,000. Measures of population however, belies Cardiff's significance as a regional trading and business centre. The population swells by approximately 70,000 daily with commuters and visitors. Cardiff is the seat of government and the commercial, financial and administrative centre of Wales. Cardiff boasts one of the most vibrant city centres in the UK and on a typical weekend, Cardiff's night time



economy can attract over 40,000 people and sometimes more than 100,000 when the Principality Stadium hosts international events.

The Vale of Glamorgan is bounded to the north by the M4 motorway and to the south by the Severn Estuary. It covers 33,097 hectares with 53 kilometres of coastline, and a population of over



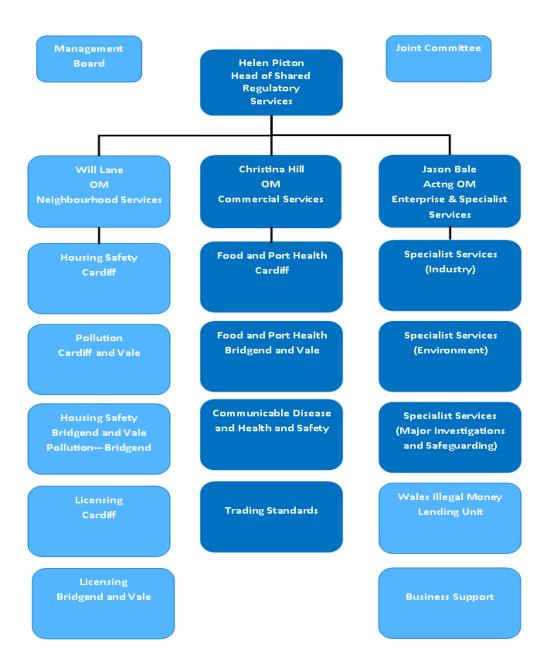
130,000 residents. The area is predominantly rural in character, but contains several urban areas of note such as Barry, Penarth, Dinas Powys and the historic towns of Cowbridge and Llantwit Major. Barry is the largest town, a key employment area and popular seaside resort. The rural parts of the Vale provide a strong agricultural base together with a quality environment, which is a key part of the area's attraction. The area includes Barry Docks and Cardiff International Airport.

## 2.2 Organisational structure

Food and Feed Services are provided by the Commercial Services and Enterprise and Specialist Services Teams within Shared Regulatory Services. The Teams consist largely of Environmental Health and Trading Standards Officers delivering services across the three areas. The Vale of Glamorgan Council act as the host authority for the Service with functions associated with this Plan delegated to the Shared Service Joint Committee.

Commercial Services deal with food safety, port health, health improvement and communicable disease, feed safety, food standards, food labelling in retail premises, whilst Enterprise and Specialist Services deal with these activities in non-retail premises together with feed safety and feed standards and where they arise, major investigations. Operational functions within the Service are illustrated in the following table with those that have responsibility for food and feed matters are highlighted in darker blue.

Shared Regulatory Services Organisational Chart



## 2.3 Scope of the Food and Feed Service

The Food and Feed Service of Shared Regulatory Services is responsible for providing a comprehensive food and feed service combining education, advice and enforcement. The scope of the Food and Feed Service includes:-

- Undertaking of food hygiene, food standards, feed and agricultural inspections;
- Investigating complaints;
- Implementing the Food Sampling programme;
- Implementing the FSA Feed Sampling Programme;
- Provision of education, training and advice on food and feed issues;
- Investigating cases of communicable disease including food poisoning;
- Responding to Food Standards Agency alerts as appropriate;
- Implementing the National Food Hygiene Rating Scheme;
- Port health;
- Approval of product specific establishments and feed businesses.

#### Responsibility

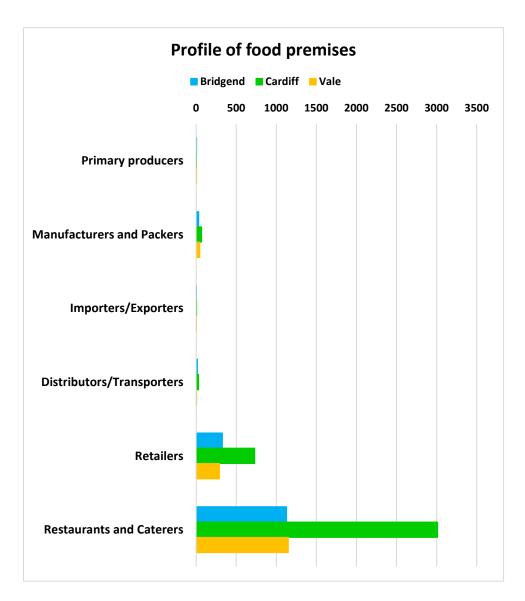
Responsibility for food safety activities is broken down as follows:-

Team	Responsibility
Food and Port Health Teams	Food Safety Intervention programme in retail and catering businesses
(Commercial Services)	Complaints and requests for service for retail and catering businesses
	Food sampling at retail and catering businesses
	Food Safety alerts and incidents
	National Food Hygiene Rating Scheme
	Port Health
	Imported food control
	Food standards in low to medium risk businesses
Trading Standards	Feed safety and standards at commercial premises
(Commercial Services)	Food Standards inspection programme in high risk retail and catering businesses
	Complaints and requests for service
	Food and feed sampling at retail premises
	Food and feed safety alerts and incidents
	Responsible for the registration/approval of feed premises.
Communicable Disease Team	Communicable disease
(Commercial Services)	
Industry (Enterprise and	Food Safety and Standards Intervention programme at manufacturing and
Specialist Services)	packing premises, distributors and primary producers.
	Complaints and requests for service
	Approval of product specific establishments
	Fee Paying Advice Visits (Food Standards & Food Safety)
	Feed safety and standards during manufacture
	Food and Feed Sampling at manufacturing premises
	Co-ordination of Events Panel attendance/follow up
	Provision of training courses for businesses
	Primary Production
<b>Environment (Enterprise and</b>	Feed safety and standards on farms
Specialist Services)	Complaints and requests for service
	Feed Sampling
	Inspection
	Feed safety alerts and incidents
Major investigations	Investigation of any large scale investigation involving food or feed
(Enterprise and Specialist	
Services)	

#### 2.4 Demands on the Food and Feed Service

#### 2.4.1 Food Safety

The region has approximately 6875 food premises with Bridgend having approximately 1516 premises, Cardiff approximately 3855 premises and the Vale of Glamorgan 1504. All require a range of interventions. The following tables provide a profile of the food premises within the three areas by type. Food business operators must register their businesses with the food authority except where the establishment requires approval. Of the 6875 identified food businesses 15 are approved (4 Bridgend, 8 Cardiff and 3 Vale).

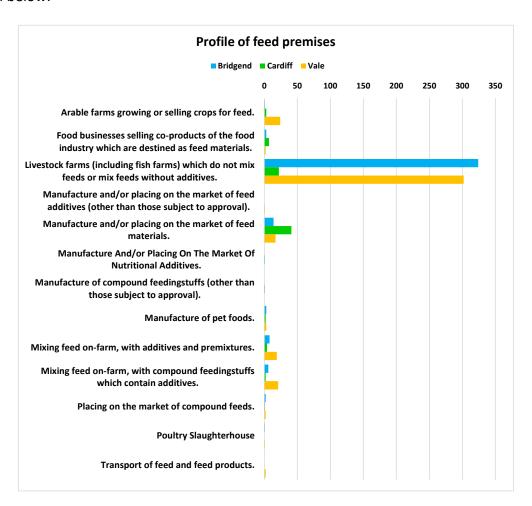


### 2.4.2 Feed Safety

Feed safety is a vitally important element of controlling food safety and this service takes a holistic view ensuring compliance from farm to fork; regulating feed that is fed to animals that eventually enters the food chain. The legislation requires that premises involved in the feed chain producing, trading in or using animal feed must be registered with local authorities; and those that manufacture complex feeds have to be specifically approved. The businesses described include livestock farms,

livestock farms which mix feed using additives, arable farms that grow, use or sell crops for feed use, fish farms, surplus food suppliers i.e. businesses supplying food e.g. bread suitable for reentering the feeding stuffs market, co-product producers e.g. a by-product of a manufacturing process such as brewers grains which can be used in animal feed, transporters of feed, manufacturers of feeding stuffs including pet food, stores and distributors such as animal feed merchants.

The Feed Law Code of Practice issued in October 2014 requires that inspection of animal feed premises are in line with a risk based approach. There are currently 840 registered feed premises, 362 in Bridgend, 84 Cardiff and 394 in the Vale of Glamorgan. Bridgend and the Vale of Glamorgan are principally rural areas dominated by livestock farming and these businesses although high in number are primarily low risk feed premises. The high risk feed premises such as manufacturers, distributors and surplus food suppliers are situated within Cardiff and the larger towns of Bridgend and the Vale of Glamorgan. There are 84 registered feed premises in Cardiff with the majority being retail premises supplying surplus food for the production of feed. The profile of these premises can be found below.



#### 2.4.3 Service delivery points

Food and feed related services are delivered from 3 service delivery points and while the service primarily operates office hours from Mondays to Fridays, weekend and out of business hours duties are carried out as the need arises. Shared Regulatory Services also operates an out of hours duty officer scheme for emergency situations.

**SRS.wales** 

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@SRS\_Wales



http://www.srs.wales

#### **Bridgend**

Civic Offices Angel Street

Bridgend CF31 4WB **Normal offices hours:** 

Monday to Thursday: 8.30am to 5.00pm

Friday: 8.30 am to 4.30pm

#### **Cardiff**

Level 1 County Hall

Cardiff CF10 4UW Normal office hours:

Monday to Thursday: 8.30am to 5.00 pm

Friday: 8.30 am to 4.30pm

#### Vale of Glamorgan

Civic Offices

Holton Road Barry

CF63 4RU

**Normal offices hours:** 

Monday to Thursday: 8.30am to 5.00pm

Friday: 8.30am to 4.30pm

### 2.4.4 External Factors and emerging issues impacting on the Service

Covid 19 Pandemic — Government restrictions on social distancing, non-essential travel and the closure of certain businesses to reduce the spread of Covid 19, resulted in routine inspections being suspended for a large part of 2020/21. Available resources were also adversely affected during the last 2 years by a number of Food Officers being repurposed into the Test, Trace, Protect service working within the regional cell of each of the local health board areas of Cardiff and Vale and Cwm Taff Morgannwg dealing with more complex cases, and the additional resources required to address the enhanced procedures expected at the ports. The Food Standards Agency Recovery Plan has enabled the service to prioritise certain inspections during the last year, namely new businesses and Category A inspections, however there remains a significant number of inspections outstanding, most notably 'C' rated and new business inspections where a backlog already existed pre-pandemic. As we look to the future, the position is still uncertain but looking more optimistic, but as we know from the last two years the situation can change rapidly. This will require the service to continue to monitor the situation and adjust resources as circumstances change, which is likely to impact on our ability to deliver 'business as usual'. This will once again require the service to adapt and re-

prioritise the services delivered throughout the year due to the reduction in available resource within food teams.

**Food Standards Agency Recovery Plan** - In recognition of the backlog of inspections created as a result of the Covid-19 pandemic, the Food Standards Agency produced a Recovery Plan to enable local authority food teams to identify and focus on those food businesses that are trading and pose the greatest risk to public health. The planned programme for 2022/23 will therefore depart from the normal programme of inspections and focus on those businesses that pose the greatest risk in accordance with the Recovery Plan during the forthcoming year, the details of which can be found in Section 3 of this plan.

**Delivering SRS in the future** - We are delivering the SRS with a reducing resource. We have to examine and introduce new ways of prioritising our services which may result in a reduction in service provision, or the charging for some services and difficult decisions about the level of service provision. These efforts will help reduce the impact of reduced funding, but maintaining performance in light of the latest budget cuts may affect the service ability to maintain delivery at existing performance levels. We will however seek to measure activities and outcomes to ensure performance is managed effectively and in a meaningful way.

With this in mind the way in which food standards is delivered has required realignment to ensure the food standard programme is met in accordance with the Food Law Code of Practice. Following significant training of staff, food safety teams now deliver some food standards services. This new approach has resulted in inspections delivering both hygiene and standards matters ensuring businesses are compliant in all aspects of food safety and standards.

The Trading Standards team continue to deliver a service in respect of food standards, however this is a focused programme on high risk areas which will take into account local intelligence whilst continuing to have regard to the Food Law Code of Practice.

Income streams already exist within the Service however there will be a need to extend these opportunities. Income generation provides a means to offset some of the likely budget reductions that the service will face over the coming years and will be generated through a number of activities. This includes the development of products and services that can be sold to businesses, offering to provide services to other local authorities and could include expanding the partnership to include new partners.

Income generation is not an answer in itself and cannot be used to generate a profit. Consequently income generation may not be sufficient to prevent reductions in service delivery, but may allow the service to maintain service delivery at existing levels.

**Retention of staff** – Recruiting to vacancies, particularly to those roles that require professionally qualified officers continues to be challenging, particularly as we are seeing a number of our officers leaving the service to secure positions elsewhere. The shortage of applicants with the right skills, abilities and experience in the different professions has created a more competitive market. These shortages, attributable to an aging professional demographic, increasing turnover and a reduced investment in sponsorship of students by Councils, have to be addressed if we are to deliver effective regulatory services. SRS has been at the forefront of taking forward the Directors of Public Protection Wales 'Building for the Future' strategy, and in making the case to Welsh Government for a regulatory apprenticeship in Wales to create a route into regulatory services for young people.

The creation of a recruitment strategy and the development of retention "initiatives" will be a key target for the SRS management team during 2022/23.

New Food Businesses – New food businesses are required to register with the service if a new business is planned, the nature of an existing business changes or if there is a change of ownership following the creation of new legal entities such as a new limited company, sole trader and partnership. All new businesses are required to be inspected and the Food Law Code of Practice requires that where possible, they be inspected within 28 days of opening. This requirement places a significant impact on the resources of the Food Safety and Trading Standards functions due to the large number of applications received. During 2021/22 900 applications were received, 529 in Cardiff, 166 in Bridgend and a further 205 in the Vale of Glamorgan all of which are required to be inspected alongside the planned programme of inspections. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention. This requirement coupled with the resource issues currently experienced due to Covid and recruitment and retention pressures, will severely impact our ability to complete these interventions. A larger number of new home catering food businesses have opened more recently, possibly due to the change in viability of normal businesses and to meet the public demand to introduce some varity to their lifestyle during "lockdown". Home caterers are required to be given at least 24 hours notice of an inspection taking place and this has given rise to difficulties of access due to last minute cancellation of appointments.

**Increase in food businesses operating online** - The increasing use of social media platforms such as Facebook and Instagram has resulted in some businesses seeking to utilise these platforms as a means to market and sell food but without first registering their food business with the local authority. In doing so, these businesses are not inspected to assess their ability to supply safe food to consumers.

**Exiting the EU** – Now that the UK has left the EU, SRS is keeping abreast with potential changes as they occur in order to be prepared for any eventuality. The United Kingdom's status as a "Third Country" to those that remain within the EU and the countries within the EU becoming "Third Countries" to the United Kingdom has resulted in changes to the legal requirements for the import of food and feed products. Imported products of animal origin and any higher risk products not of animal origin must be imported through a Border Control Post. Currently neither the ports nor airport in the SRS region possess this status in relation to food. In addition a recent survey has established that no feed is currently being imported via these entry points. It is however anticipated that trade patterns may change in the future and surveillance to identify such changes is being maintained.

Exit from the EU has created additional duties for SRS due to the requirement of health certificates to be issued to exporters of food to other EU countries and the need for increased surveillance inland or imported foods particularly originating from third countries due to the removal of checks if imported via an EU country.

**Inspection of food imports** - A recent announcement by the UK Government to scrap plans to introduce physical checks on fresh food imported from the European Union, that was planned this summer, has caused the Chartered Institute of Environmental Health to express concern about the severe consequences this could have for UK consumers and for the public health of the country. The plan to introduce checks on animal and plant products entering the UK from the EU came about in the wake of the UK's exit from the European Union and would have impacted a wide-range of

food sold in supermarkets. However, warnings that such checks could make food more expensive and exacerbate the cost of living crisis, resulted in the Government scrapping all inspections for imports from the EU. The CIEH believe that such a move heightens the danger of food fraud and crime where food of unknown origin and questionable quality could end up on supermarket shelves and in our homes. If such concerns are realised, this will inevitably impact on the work of SRS.

Implementation of infection control measures directed by Public Health Wales at points of entry – The impact of Covid-19 on travel has seen various restrictions imposed during the last 2 years, due to the continuing presence of the virus. While it appears that such restrictions are being lifted as the Covid-19 outbreak comes under control within the UK, the 'variants of concern' originating in

the Covid-19 outbreak comes under control within the UK, the 'variants of concern' originating in other countries means that it is inevitable that additional control measures will be required to be implemented at Cardiff International Airport and Cardiff and Barry seaports which will be the responsibility of the port health officers to ensure are adhered to.

Cost of living crisis – The cost of living crisis in the UK is currently dominating the headlines. With inflation at its highest level in 30 years, the UK is seeing petrol and grocery prices increasing, together with tax increases and exponential rises in energy costs. Disruption of global supply chains due to Covid-19 and global shipping costs has also resulted in increased prices and shortages of certain products. There are now reports of further shortages as a consequence of the war in Ukraine, most notably sunflower oil and wheat. Most of the sunflower oil used in the UK is imported from Ukraine and is used extensively in cooking, and ingredients in many food products, including crisps, chips, ready meals, biscuits and mayonnaise. Shortages and price hikes have resulted in food manufacturers looking for alternatives to minimise disruption in availability with several already switching to refined rapeseed oils. The Food Standards Agency have indicated that this change has been done so quickly that manufacturers have been unable to update food labels. While the FSA deem this to be of very low risk to consumers, it does highlight potential issues arising from the cost of living increases and product shortages. Food businesses, for example, already struggling following the pandemic, may see a reduction in customers who can no longer afford to eat out. They, faced with rising prices may be tempted to substitute food items for cheaper alternatives and cut corners in their food hygiene processes to save money, placing even greater demands on SRS at a time when the service itself is attempting to recover from the effects of the pandemic and staff shortages.

Allergens – Food Allergies have a major impact on many consumers within the community. In the UK alone around 10 people die from allergic reactions to food every year due to undeclared allergenic ingredients and an estimated 1-2% of adults and 5-8% of children have a food allergy which accounts for around 2 million people within the population. Further recent high profile cases within the media has inceased awareness of these issues and as such the trading standards service has increased its market surveillance exercises to ascertain compliance levels in an attempt to protect public health. The continued non-compliance found by officers within the service demonstrates that compliance with the associated legislation remains a challenge for the service. Further survey work is planned for this financial year to target this area of work.

**Natashas Law** – The new law, known as Natasha's Law, came into effect on 1 October 2021. Aimed at protecting consumers by providing life-saving allergen information on the packaging, it will require food businesses to provide full ingredient lists and allergen labelling on foods pre-packaged for direct sale on the premises, with allergenic ingredients emphasised within the list. While SRS has prepared businesses for the change by providing online workshops, it is anticipated regulations will may have a significant impact on the service by way of increased demands for business advice,

increased service requests/complaints and serious food incidents as a result of businesses failing to comply with the new requirements.

Major events - SRS plays an important role in the successful staging of major events across the three local authority areas. In addition to dealing with any licensing matters associated with a particular event, SRS plays an important role in ensuring that food sold at events is safely prepared and stored, and that it is labelled correctly. Major events staged through the participant Councils go through a detailed planning process via the respective Events Safety Advisory Group in Bridgend and the Vale of Glamorgan, and in Cardiff via the Events Liaison Panel. SRS plays a role throughout the planning stages with respect to food safety, health and safety and brand protection. While summer is traditionally the busiest time for events, it is anticipated that the summer of 2022 will be exceptionally busy as concerts postponed during the pandemic are re-scheduled in addition to newly scheduled events to make up for the time lost during the pandemic. This is due in part to the success of the City of Cardiff Council in promoting itself on the world stage as the home of successful events. All of this has an impact on the Shared Service in terms of meeting demand from other areas of responsibility, at a time of diminishing staff resource, and in covering weekend and evening work.

Review of ICT and mobile working solutions - Since the inception of SRS, officers have been provided with access to the systems of the 3 legacy authorities of Bridgend, Cardiff and the Vale of Glamorgan. This enables officers to access the essential IT systems they need to fulfil their duties for the relevant authorities. While this has worked well, more recent updates to systems and software have impacted on the continuity of current arrangements affecting connectivity and access. SRS maintains good relationships with the ICT departments of the legacy authorities to deal with issues as they arise in the short term, however it has become evident that there is a need to consolidate the long term access requirements of SRS to ensure continued access and smooth running of systems in order to provide seamless delivery of essential services. Similarly an essential component of the operating model for SRS was the introduction of technical and mobile working solutions that enable employees to work remotely. This has contributed to the success of the service, but as agile working becomes the norm for many within the service, we are finding that the technology deployed is becoming outdated. The Covid-19 outbreak reinforced this as many more staff transitioned to working from home. It is clear that as technology improves, better facilities now exist which could further enhance the work of SRS and its remote working capabilities as we move forward. SRS will continue working with staff via the ICT Review working group and ICT to explore options for improving equipment and systems to ensure that we deliver services both efficiently and effectively.

**Seasonal demand** – Porthcawl is home to the largest caravan park in Europe which attracts a large influx of tourists during the summer months. This results in a number of food premises which operate on a seasonal basis, both at the caravan site, the funfair and within the town. Inspections and other enforcement activity at these premises take place during the restricted trading period. Likewise Barry Island as a sea side attraction equally attracts a number of tourists during the summer months. This results in a number of food premises operating on a seasonal basis with food business operators changing on a frequent basis.

## 2.5 Enforcement Policy

Fair and effective enforcement is essential to protect the economic, environmental and social interests of the public and business. Decisions about enforcement action and in particular the decision to prosecute, has serious implications for all involved and for this reason, the Shared Regulatory Service has adopted a Compliance and Enforcement Policy.

The Compliance and Enforcement Policy sets out the standards that will be applied by the Service when dealing with issues of non-compliance, and what residents, consumers and businesses can expect. Such a policy helps to promote efficient and effective approaches to regulatory inspection and enforcement, and balances the need for improvement in regulatory outcomes with minimising unnecessary burdens on business.

Traditionally based upon the principles of the Enforcement Concordat and the Regulators Compliance Code, local authority Enforcement Policies must now reflect the Regulators Code of 2014 and the regulatory principles required under the Legislative and Regulatory Reform Act 2006

The Regulators Code is based upon six broad principles:

- Regulators should carry out their activities in a way that supports those they regulate to comply and grow;
- Regulators should provide straightforward ways to engage with those they regulate and hear their views;
- Regulators should base their regulatory activities on risk;
- Regulators should share information about compliance and risk;
- Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply;
- Regulators should ensure that their approach to their regulatory activities is transparent.

# 3. Service Delivery

# 3.1 Interventions at Food and Feeding Stuffs Establishments

It is the policy of the Shared Regulatory Service to ensure that food and feed businesses within its jurisdiction receive interventions e.g. inspections in accordance with the Food Law and Feed Law Codes of Practice and Practice Guidance. This requires local authorities to have a programme of interventions which is adequately resourced and provides sufficient information to show that businesses are complying with food law.

#### 3.1.1 Food Hygiene Interventions

The typical planned programme for food hygiene interventions is based on the requirements of the Code of Practice and Practice Guidance. Following inspection all food businesses are risk rated from A (highest risk) to E (lowest risk). A suitable intervention is required in accordance with that risk rating.

Official controls are required at prescribed frequencies for risk categories A-D Category A businesses require an inspection twice a year, category B once a year and category C, at 18 month intervals. Category D interventions, however, can alternate between an official control, e.g. a full inspection, and a visit by a non Environmental Health Officer.

Low risk food premises (Category E) need not be subject to an official control, however they must be subject to an alternative enforcement strategy not less than once in any 3 year period, this could include a postal questionnaire.

When a full inspection is completed as an intervention on an establishment, a risk assessment will be made based on the Officer's findings. This will result in some movement of food businesses between the different risk categories. Food Establishments with improved performance will move to a lower risk category and under-performing businesses will move to high risk categories and receive more frequent interventions.

All new food businesses should receive an inspection within 28 days of registration or from when the authority becomes aware that the establishment is in operation. The requirement to undertake initial inspections within 28 days may in some circumstances present a conflict for resources to complete other higher priority activities. In such circumstances prioritisation of interventions within the authority's programme should be undertaken in a risk based manner.

While the Code of Practice allows some lower rated businesses to be subject to interventions other than a full inspection, the introduction of the Food Hygiene Rating Act means that in order to be given a hygiene rating, food businesses within scope of the Act need to have received a full inspection.

#### Proposed food hygiene interventions 2022/23

Government restrictions on social distancing, non-essential travel and the closure of certain businesses to reduce the spread of Covid 19, resulted in routine inspections being suspended for a large part of 2020/21. This inevitably led to a backlog of programmed inspections across the 3 areas.

In recognition of these issues, the Food Standards Agency developed a Recovery Plan to enable local authority food teams to identify and focus on those food businesses that are trading and pose the greatest risk to public health. The planned programme for 2022/23 will therefore depart from the routine programme of inspections mentioned above and focus on those businesses that pose the greatest risk in accordance with the Recovery Plan during the forthcoming year.

#### **A Rated Food Businesses**

100% of A rated food businesses will be subject to a full inspection.

#### **B** rated businesses

All establishments rated Category B due for inspection will receive an onsite intervention by the end of June 2022. Thereafter these establishments will receive an intervention as required by the Food Law Code of Practice at the specified intervals.

#### C rated businesses

All establishments rated **Category C for hygiene that are less than broadly compliant** (food hygiene rating of 0, 1 or 2) will receive an onsite intervention by the end of September 2022. Thereafter these establishments will receive an intervention as required by the Food Law Code of Practice at the specified intervals.

All establishments rated **Category C for hygiene that are broadly compliant or better** (food hygiene rating of 3, 4 or 5) will receive an onsite intervention by the end of March 2023. Thereafter these establishments will receive an intervention as required by the Food Law Code of Practice at the specified intervals.

NB. In the case of **C** rated establishments with **2** consecutive food hygiene ratings of **5**, one intervention will be missed and put back into the system for interventions in accordance with the Recovery Plan.

#### D rated food businesses

D rated food establishments can alternate between a full inspection and a non official control e.g. an information gathering visit using a questionnaire. No new risk rating or food hygiene rating score is permitted from a non official control. If at the time of the information gathering visit there is concern that the level of food safety has deteriorated, or the food operation has changed, then the intervention will be referred to a competent officer for a full inspection.

During 2022/23 all establishments rated **Category D for hygiene that are less than broadly compliant** (food hygiene rating 0, 1 or 2) will receive an onsite intervention by the end of December 2022. Thereafter these establishments will receive an intervention as required by the Food Law Code of Practice at the specified intervals.

All establishments rated **Category D for hygiene that are broadly compliant** (food hygiene rating of 3, 4 or 5) will not receive an intervention unless intelligence/information suggests risks have increased/standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed.

#### **E rated food businesses**

E rated food businesses may be subject to an alternative enforcement strategy only, i.e. a postal questionnaire. (No new risk rating or food hygiene rating score is permitted from this type of intervention). The information received will allow assessment of the current level of compliance with food hygiene legislation and highlight any changes to the business. Where changes in management, activities or serious deficiencies are identified an inspection will be undertaken.

For 2022/23 no interventions will be required unless intelligence/information suggests that risks have increased/standards have fallen or the establishment is otherwise considered a priority for intervention due to the risk posed.

#### **Inspection of New Businesses**

Unrated food establishments will be subject to a full inspection. This should be undertaken within 28 days of their opening. Due to the large backlog of new business inspections, these will be prioritised during 2022/23.

#### **Food Hygiene Revisits**

Inspection of food businesses often requires follow up visits to ensure compliance with food safety requirements. The intervention and revisit procedure requires that all businesses rated 0 are revisited within 28 days and all those rated 1 or 2 are revisited within 3 months. Officers are also requested to revisit to ensure that any food safety issues of concern are fully addressed.

#### **Appeals**

Food businesses have a right under Section 5 of the Food Hygiene Rating (Wales) Act 2013 to appeal the food hygiene rating given to the establishment if, they do not agree that the rating properly reflects the hygiene standards found at the business at the time of the inspection or that they believe that the rating criteria was not applied correctly when producing the rating. Businesses have 21 days from the date of receipt of the notification letter to lodge an appeal and similarly the outcome of the appeal will be communicated to the business within 21 days from the date the appeal was received.

#### **FHRS Re-scores**

In addition to appeals, food business operators also have a right to request a rescore inspection for the purpose of re-rating under the Food Hygiene Rating Scheme. This request can be made anytime after the statutory inspection, provided that businesses have made the required improvements. In these circumstances, SRS are permitted to recover costs for such an inspection and charge a fee accordingly. The re-visit must be undertaken within 3 months.

#### **Inland Imported foods**

During the inspection of food businesses, officers consider the origin of imported foods. Any indications that food may not have been subject to correct import controls are investigated and, where necessary, the food is removed from the food chain.

#### **Port Health Functions**

As a Port Health Authority, Shared Regulatory Services is responsible for the enforcement of food law and promotion of food safety issues on board all ships and aircraft arriving in Cardiff and the Vale. This includes responsibility for monitoring the safety of imported food and feed at the point of import, the control of infectious disease, undertaking ship inspections, enforcing food safety and hygiene standards and general public health within the Port.

Currently neither the seaports of Barry or Cardiff, nor Cardiff International Airport are designated Border Control Posts. This means that only food products other than those of animal origin, feed or high risk foods not of animal origin are permitted to be imported into these ports. Currently there is no feed or food routinely imported through the ports but the service continues to monitor shipping and aircraft movements to ensure compliance with the relevant law.

The Port Health Service Plan outlines in detail the work undertaken in relation to the Authority's Port Health functions including food safety.

#### **Programmed Interventions for 2022/23**

The table below illustrates the risk ratings of premises, the intervention frequencies and the total number of interventions to be delivered during 2022/23 in line with the FSA Recovery Plan.

Food Safety Intervention Plan 2022/23					
Risk Intervention Category frequency		Number of Interventions due at start of year (Including any backlog)			
			Bridgend	Cardiff	Vale of Glamorgan
	Α	6 mths	0	12	2
HIGH RISK	В	12 mths	47	134	71
HIG	С	18 mths	576	1394	534
	Hig	h Risk Total	623	1540	607
WO	D	2 years	4	5	2
MEDIUM-LOW RISK	E/AES *	3 years	0	0	0
MED	Medi	um to low Risk Total	4	5	2
Si		ed (New business d o/s from 21/22	114	422	124
NEW BUSINESSES	Unrated (New business identified during course of year)		Est 166	Est 529	Est 205
NEW		ed total (Estimate 2021/22 no. d)	280	951	329
REVISIT		ts (Estimate based /22 actual ken)	32	273	51
ТОТА	LS		939	2769	989

#### **Food Safety Projects**

**Food Hygiene Rating Scheme Display Project** - The Food Hygiene Rating (Wales) Act 2013 and regulations made thereunder to ensure informed consumer choice require food business operators to display their current food hygiene rating in a conspicuous place at the entrance to the business and publicity materials used including takeaway menus.

If resources allow, SRS intends to complete a survey of food businesses across Bridgend, Cardiff and Vale of Glamorgan to check that the current food hygiene rating is being displayed in an appropriate place and in relevant publicity materials.

The aim of the survey is to ensure that all businesses are compliant with display requirements to not only ensure informed customer choice but also to assist in fair competition for food businesses to support the local economy.

Failure to display the current rating in accordance with the requirements without reasonable excuse will result in the service of a fixed penalty notice to address the issue and eventual prosecution if not addressed.

**Shopping Basket Survey** - The Welsh Food Microbiological Forum annually provide a list of food products to be sampled that have an emerging or identified risk. Participation by the local authorities in this survey helps to identify non- compliant foods for intelligence data gathering and action to be taken against securing food safety. Approximately 120 samples are hoped to be obtained for further action to be considered as appropriate.

**Food Safety Training Expansion** - SRS has further expanded the training being offered for businesses and now delivers training both face-to-face and online, to provide more choice and flexibility for food businesses. The range of courses offered have also been expanded to include the Level 3 Award in Food Allergen Management in Catering and Level Four Award in Managing Food Safety in Catering courses. One-to-one or group bespoke training, tailored to the needs of the business, is also available.

#### 3.1.2 Food Standards Interventions

Food Standards is a legislatively complex area covering meat speciation, composition, labelling, claims, allergens, chemical contamination (such as heavy metals and carcinogens such as mycotoxins), compositional standards (such as meat content), additives, food fraud and genetically modified ingredients and foods. It also covers articles that come into contact with food and ensuring that there is no transfer of chemicals including carcinogens.

Primary producers are the initial growers and manufacturers of all food commodities such as meat, grains, eggs, honey etc. and the most common primary producers are farms. As with food and feed businesses, primary producers have to register with the authority and are subject to the same controls as more regular food and feed businesses.

The Service uses the food code of practice as a risk assessment model and the Food Safety Act.

Food standards premises are divided into three categories namely high, medium and low. The Food Standards Code of Practice indicates that high risk premises are inspected every 12 months, medium

risk premises are inspected every 24 months and low risk premises could be subject to an alternative enforcement strategy at least once during any 5 year period. Some establishments which undertake food activities do not meet the definition of a food business establishment and therefore fall outside of the scope of Regulation (EC) No 852/2004. These premises do not carry a food standards risk rating however they do remain subject to the provisions of the Food Safety Act 1990 and Regulation (EC) No 178/2002.

Government restrictions on social distancing, non-essential travel and the closure of certain businesses to reduce the spread of Covid 19, resulted in routine inspections being suspended for a large part of 2020/21. This has inevitably led to a backlog of programmed inspections across the 3 areas. In recognition of these issues, the Food Standards Agency developed a Recovery Plan to enable local authority food teams to identify and focus on those businesses that are trading and pose the greatest risk to public health. The planned programme for 2022/23 will therefore depart from the normal programme of inspections and focus on those businesses that pose the greatest risk in accordance with the Recovery Plan during the forthcoming year.

#### **High risk businesses**

100% of high risk food businesses will be subject to a full inspection in relation to food standards.

#### Medium to low risk businesses

Medium to low risk businesses will receive an intervention only if intelligence received suggests risks have increased or when inspected for food hygiene by an officer competent to complete an inspection.

#### **New business**

Unrated food establishments will be subject to a full inspection. This should be undertaken within 28 days of their opening.

#### **Unverified businesses**

Unike new businesses are those businesses recorded on the SRS database that have yet to be rated. Unlike new businesses which are also unrated, these are business records that when transferred from our former database to the new Tascomi database contained errors. Significant work has been carried out to remedy this situation since they were first identified, however there still remains a large number of businesses that require a rating. This work will progress during the year via a range of approaches including desktop exercises, alternative enforcement strategies and inspection. Please note unverified businesses are only applicable to food standards.

#### **Revisits**

Food visits that fail to comply with significant statutory requirements should be subject to appropriate enforcement action and a revisit to assess compliance. Failure to comply with significant statutory requirements may include failure to comply with:

- A single requirement that comprises food standards or prejudices consumers
- A number of requirements that, taken together, indicate ineffective management.

Each situation should be judged according to the circumstances and the authorised food officer should make a professional decision as to whether a revisit is appropriate. The timing of the revisit

should be appropriate depending on the matters which require attention. The authorised food officer should make a professional judgement and discuss the timescales with the proprietor. Re visits should be undertaken by the officer who conducted the original intervention and the results of the revisit should be recorded in the relevant premises file and computer database. If the revisit reveals that the proprietor has failed to comply with any legal requirement then the appropriate enforcement action should follow.

Generally revisits are undertaken where there are significant breaches of the legislation. Where an officer intends to take action or make recommendations that may affect the policies or procedures of a business with outlets outside the SRS boundary they should consult the relevant Home Authority.

Food Standards Intervention Plan 2022/23				
Risk Intervention Category Frequency		Number of Interventions due at start of year (including any backlog)		
		Bridgend	Cardiff	Vale of Glamorgan
High Risk	12 mths	10	20	8
Medium Risk	24 mths	0	0	0
Low risk	60 mths	0	0	0
New business	New business identified at 1 April o/s from 21/22)	131	730	235
	Estimate based on new business identified during 21/22	Est 164	Est 530	Est 194
	Total (Estimate based on 21/22 no. identified)	305	1280	437
Unverified businesses	This relates to errors within the database on set up	28	244	5
Re-visits	Estimate based on 21/22 undertaken	6	5	0
Total		339	1529	442

#### **Food Standards Projects**

**Retail Butcher Survey** – SRS will conduct a survey of retail butcher premises to establish compliance with Food Standards and Weights and Measures legislation offering advice and education where necessary. The focus will be to visit butcher premises that were not visited in 2021/2022 and on revisiting those non-compliant butcher premises identified during 2021/22 to further assess compliance and to take enforcement action where appropriate.

#### In addition SRS will participate in:-

• a number of regional projects agreed by the Glamorgan Group (GG) which include the following:

- Vegetarian & Allergen sampling of vegetarian meals at Chinese takeaways samples will be obtained from takeaway business of dishes described as Vegetarian. The sampling officer will request a meal described as suitable for vegetarians and will also declare an allergen to Crustations and fish. Analysis will determine whether there is present in the food of Crustations and fish.
- Alcohol levels in 'Craft' alcoholic drinks locally produced spirits and ales samples will be obtained of locally produced pre-packed spirits and ales and analysis will be made to determine whether the alcohol strength declared on the label is accurate.
- The service will obtain food samples as part of the FSA funded food sampling project (Operation OPSOM) which is yet to have been determined by the FSA.
- Doner Kebab following a number of adverse results in 2021/2022 further samples will be taken of Doner kebabs where the officer will declare an allergy to Milk. Analysis will be undertaken to establish the presence of meat species other than lamb and also to determine presence of milk.
- Continue to address through the use of self assessment questionnaires, those food businesses
  yet to have been risk rated in relation to food standards following the suspension of
  inspections during the pandemic and from the legacy issues arising when transferring data to
  the SRS Tascomi database.
- Carry out further surveys that are highlighted on the sampling plan including complaint sampling as and when required.

#### 3.1.3 Feed Hygiene Interventions

The BSE health scare during the last two decades revealed the fundamental link between the feed we give to animals and our own health. Consequently feed safety is now considered a fundamental part of food safety and is enforced by the Service.

The controls are similar to those relating to food. A register is maintained of feed businesses, and inspections are completed according to their risk rating in agreement with the FSA and any earned recognition. Checks are made during inspections to ensure that feed is stored hygienically and that feed placed on to the market and fed to food-producing animals is safe and labelled correctly to allow for product traceability and recall in the event of a feed incident. The ring fenced funding administered by the FSA has allowed SRS to review and refine the information held on the register which in turn has enabled the better identification and targeting of feed premises for interventions.

Animal Feed premises are risk rated following the Feed Law Code of Practice risk assessment framework, which provides appropriate risk assessment criteria for officers to assess premises against. This is used to identify high risk premises, and to plan the animal feed inspection programme in line with our agreed programme which is funded by the FSA. The assessment of feed businesses is undertaken on each inspection and the assessment is updated by the officer following the inspection.

The risk assessment for feed premises is undertaken against the following factors:

#### Risk to Animal/Human Health and/or Other Businesses

This factor considers the potential adverse effect on animals/human health, and the consequences for other businesses, should the establishment not comply with feed legislation.

#### Extent to Which the Activities of the Business Affect any Hazard

This factor considers the type of activities that the feed business undertakes, the need for any of those activities to be closely monitored and controlled, and the feed business operator's potential effectiveness in maintaining compliance with animal feed law

#### **Ease of Compliance**

This factor considers the volume and complexity of animal feed law that applies to the business and with which it has a responsibility to ensure compliance.

#### Animals and People at Risk

This factor considers the number of animals/people likely to be at risk if the business fails to comply with animal feed legislation.

#### **Level of (Current) Compliance**

This factor considers the level of compliance with animal feed law observed during the inspection. Adherence to relevant UK or EU Industry Guides to Good Practice and standards produced by assurance schemes should be considered.

The above factors are allocated a range of scores depending on the level of compliance, with higher scores awarded where high risks are considered. The Code of Practice sets out the inspection frequency requirements depending on the risk score as follows:

#### Feed Premises Inspection Frequencies as set out by the Feed Law Code of Practice

Risk Category	Points Range	Minimum Inspection Frequency
А	147-200	At least every 12 months (1yr)
В	122-146	At least every 24 months (2yrs)
С	106-121	At least every 36 months (3 yrs)
D	85-105	At least every 48 months (4 yrs)
Е	0-84	At least every 60 months (5yrs)

Under the Code of Practice, the inspection of higher risk businesses takes preference over the inspection of lower risk. However, implementing an inspection programme which includes only establishments that are rated as high risk is also not acceptable.

All feed business operators registered or approved for high risk feed activities such as manufacturers, surplus food suppliers, co-product producers and distributors are required by the Feed Law Code of Practice (Wales) to have interventions undertaken by a qualified, competent and authorised officer. Low risk premises such as livestock farms which may or may not mix with additives, arable farms, official controls at primary production and at points of entry can have interventions undertaken by a competent authorised officer.

#### **High risk business**

In line with the risk assessment process high risk premises require an annual inspection, owing to the potential risks to the feed chain. On the whole the manufacturing of animal feed, feed additives, anti-toxicants, proteins or compound feeds have higher risk factors in the risk assessment. Within SRS there are very few of these type of premises in operation. Currently the number of Category A – High Risk banded premises is very low with only 3 premises registered.

#### Medium to low risk business

In terms of medium risk categories (B-C), there are limited number of premises, within SRS, and the majority of these are suppliers of surplus food which is placed into the feed chain. Examples of these are brewers with surplus grains and supermarkets with surplus breads etc.

The majority of the feed premises within SRS fall within the Cat E risk category, of low. This is owing to the fact that the majority of the feed premises are livestock farms, where many farms buy in feed to provide their animal's feed during the winter months when grazing is restricted.

#### **Feed Safety Re-visits**

Re-visits are undertaken in order to ensure compliance as a result of an identified non conformity during an initial inspection or as a result of a complaint. It is therefore not possible to plan the number of re-visits that will be undertaken during the year. All revisits are recorded on our quarterly return which is provided to the FSA.

#### **New Businesses**

In line with the Feed Law Code of Practice, SRS must make use of information supplied by feed business operators in connection with the registration or application for approval of their feed business establishments in accordance with Article 31 of Regulation (EC) No 882/2004, in order to determine when to carry out an initial inspection, there is no set target requirement. However SRS will ensure that all new feed businesses and those subject to Annex II of Regulation (EC) 183/2005 will as a minimum receive a full inspection within 3 months of opening. Similarly new businesses carrying out primary production only will be subject to a full inspection within 3 month of opening.

The numbers of new feed businesses which open each year are very small. The majority of feed businesses falling within the remit of Shared Regulatory Services are well established with little turnover of business ownership.

Feed Safety Intervention Plan 2022/23					
Туре	No. of inspections due				
Inland Feed inspections	Bridgend	Cardiff	Vale of Glam	Total	
Manufacturer (A01-08 and R01-04)			1	1	
Co Product Producer (R12)	2	2		4	
Mobile mixer (R04)					
Importers					
Stores (R09)					
Distributor (A01-08, R01-03, & R05)	1			1	
Transporter (R08)					
On farm mixer (R10 Annex II)	1	2	2	5	

On farm mixer (R11)	2	0	1	3
Pet food manufacturer (R06)	2	0	1	3
Supplier of feed materials/surplus food (R07)	5	16	3	24
Total inland feed inspections	13	20	8	41
<b>Feed Hygiene at Primary Production insp</b>	ections			
Livestock farms (R13)	43	2	34	79
Arable Farms (R14)			2	2
Total Feed Hygiene at Primary	43	2	36	81
Don't alter the continue				
Production inspections				
Miscellaneous				
•	1			1
Miscellaneous	1		7	1 8
Miscellaneous Poultry slaughterhouse (435)		3	7 4	
Miscellaneous Poultry slaughterhouse (435) Unknown	1	3 3	•	8

## 3.2 Food and Feed Complaints

There are occasions where unsafe practices or potential risks come to light as a result of a complaint or concern raised by a member of the public or employee and these are treated as complaints. Complaints received vary from foreign bodies, to mould, to compositional standards or to the perception that the food or feed is spoiled. Following a complaint an Officer will carry out an investigation to verify the existence of the problem and where necessary seek to minimise the risk. This will often require the procurement of a sample, which would not form part of the sampling programme.

Support from the Public Analyst and Public Health Wales Laboratory is needed to complete investigations which place a financial implication on service provision.

Based on the number of complaints received during 2021/22 it is estimated that for the period 2022/23 the following numbers of complaints could be received.

Complaint type	Bridgend	Cardiff	Vale of Glamorgan
Food Hygiene	79	324	94
Food Complaints	28	87	34
Food Standards	15	68	24
Feed Safety	1	2	0

# 3.3 Home Authority Principle and Primary Authority Scheme

The Home Authority Principle applies to businesses with outlets in a number of local authority areas. The aim of the scheme is to improve consistency in the way local authorities enforce food safety in a company throughout the country. A Home authority is an authority that acts as a focal point for liaison in food issues between a company and other local authorities that have outlets in their local authority area. Shared Regulatory Services assists local authorities and the FSA with their investigations whenever the need arises under the Home Authority Principle.

The Primary Authority Scheme builds on the foundations created by the Home Authority Partnership Scheme but entails a shift in the nature of the relationship between business and regulators bringing benefits to both parties. It offers local authorities the opportunity to develop a constructive partnership with a business that can deliver tailored Primary Authority advice along with coordinated and consistent enforcement for the business and provides new funding arrangements, whilst allowing local authorities to recover costs from partner businesses. The Primary Authority Scheme is especially beneficial to businesses with outlets in a number of local authority areas. The partnership is a legally recognised partnership that provides advice, ensures consistency of regulation between local authorities and reduces duplication of inspections and paperwork. The Office for Product Safety and Standards promotes the Primary Authority scheme in Wales.

Since October 2017, amendments to the Regulatory Enforcement and Sanctions Act brought some significant changes to the Primary Authority scheme which has broadened the scope for SRS to enter into PA partnerships. As a result of this, some existing Primary Authority Partnerships in England now require additional support for Welsh Devolved matters so that businesses trading in Wales in sectors such as food, public health, agriculture, environmental protection, pollution control, and housing need to have a Welsh Primary Authority partner to issue advice in Wales. SRS is currently supporting 25 of our 32 partnerships in this new capacity on food hygiene and food standards matters to ensure continued Primary Authority coverage in Wales which includes some 'big names' in the retail and other sectors with a number of other prospective Welsh partnerships in the discussion phase.

Primary Authority advice that has been issued must be considered by local authorities during their interaction with that business. The Primary Authority can block enforcement if the enforcing authority has not considered the relevant Primary Authority advice or disagrees with their interpretation.

Conversely, where the Service deals with a business that has a primary authority agreement in place with another Authority, the following guidelines will apply: -

- Where Shared Regulatory Services acting as an enforcing authority has concerns about the compliance of a business that has a primary authority, it will discuss the issue with the primary authority at an early stage.
- If enforcement is envisaged Shared Regulatory Services will notify the primary authority of the proposed enforcement action through the Primary Authority Register.
- Shared Regulatory Services will follow published inspection plans and will only deviate if required to issue a food hygiene rating or events during a visit require this.

#### 3.4 Advice to business

Shared Regulatory Services aims to assist businesses wherever possible by providing food and feed safety advice through a variety of channels, such as:-.

- Advice provided as part of the inspection process;
- Responding to complaints and requests for service;
- Twice yearly food newsletter;
- Provision of information leaflets;
- The provision of chargeable training;
- Promotion and participation in national events, such as Food Safety Week;
- Participation in working groups, such as Events Liaison Panel;
- Advice through Shared Regulatory Services website;
- Regular Food Business Forums;
- Practical targeted training at business premises;
- Paid for food hygiene advice visits available to all applicable food businesses;
- Food Standards advice provided on inspection and provision of labelling reviews on a chargeable basis.

# 3.5 Food and Feed Sampling

Sampling is important in helping protect public health and safety by testing food and feed to ensure they meet composition, labelling, chemical and microbiological safety standards in accordance with current Codes of Practice and guidance. Proactive sampling is undertaken in the following situations:-

- National, regional and locally co-ordinated surveys/programmes;
- Local food and feed producers;
- Home and originating authority samples;
- Complaints;
- Process monitoring and verification;
- Special investigations;
- Imported foods and feed;
- Inspections;
- Durability;
- Surveillance/screening;
- Water quality monitoring aboard ships, approved premises and food businesses served by private water supply.;
- Foods procured by the authority will be checked for compliance not only with legal standards but the specifications of the contract. This will include meat speciation.

Each year Shared Regulatory Services receives a budget allocation for microbiological analysis of samples from Public Health Wales.

#### **Food Hygiene Sampling**

Sampling to secure the safety of food involves testing of food and water for microbiological, chemical, physical and/or radiological parameters (refer to attached plan contained in Appendix A).

The policy is largely determined by the Service's participation in proactive schemes co-ordinated through agencies such as the Food Standards Agency (FSA), Public Health Wales, Local Government Regulation (previously LACORS), Welsh Food Microbiological Forum (WFMF) and Public Health England. End product testing at approved establishments and high risk premises also constitutes an important element of the proactive work undertaken by the Service. Reactive sampling arrangements cover food importation, food poisoning outbreaks and the investigation of water and food complaints.

#### **Food Standards Sampling**

Priorities for food sampling are primarily identified after giving consideration to the risk to consumers in terms of safety or economic loss, data from the previous years sampling programme indicating areas of concern, emerging risks and priorities identified by local and National intelligence.

An area of growing concern surrounds the declaration and the cross contamination of allergenic ingredients in takeaway dishes. There have been a number of well publicised cases in the media that have highlighted the dangers of eating unsafe food sometimes with fatal consequences. During recent years priority has been given to sampling products from takeaway premises to establish the presence of undeclared allergens and this work will continue alongside an educational programme aimed at smaller retail premises to increase compliance.

SRS will continue to support operation OPSON a global initiative jointly coordinated by Europol-INTERPOL focusing on counterfeit and substandard food, and the organized crime networks behind this illicit trade. In the UK activities are co-ordinated by the National Food Crime Unit (NFCU) and the Food Standards Agency (FSA).

Details of the planned sampling programme for Food Standards can be found at Appendix B.

#### **Feed Hygiene Sampling**

Contaminated or unfit feed given to animals can adversely affect animal health and the health of consumers of animal products (milk, meat and eggs). While the frequency of major feed incidents is low, the impact in terms of public health risk, cost and reputational damage can be high.

When incorporated into a programme of official feed controls, risk based sampling will ensure that a robust, targeted and proportionate level of enforcement takes place. The sampling programme is designed to detect/prevent potential threats to feed safety for food producing animals, based on officers' local knowledge as well as the national enforcement priorities set by the FSA.

Feed sampling during 2022-23 will follow the National Enforcement Priorities for Feed which are contained in Appendix C of this Plan.

# 3.6 Control and investigation of outbreaks and food related infectious disease

All cases of communicable disease are investigated and full details of this work are outlined in the Communicable Disease and Health Protection Plan 2022/23. This includes the investigation of notified confirmed and suspected cases and outbreaks of food poisoning and food borne disease.

These investigations are supported by reactive inspections of food businesses, food, water and environmental sampling of implicated premises and proactive delivery of bespoke training.

The investigation of cases and outbreaks of food poisoning routinely includes:-

- The receipt and verification of laboratory confirmed isolates from Public Health Wales
  Microbiological Laboratories (via Tarian) and unconfirmed reports of food poisoning from
  Medical Practitioners, members of the public, cases, employers, other local authorities and
  rarely masters of vessels visiting the port and their agents;
- Telephone and less frequently face to face interviews with cases, close contacts and the provision of infection control advice;
- Managing exclusions of cases and contacts from the workplace, schools and health care settings:
- Liaison with GP surgeries, hospitals, Public Health Wales and other stakeholders during the investigation for the purposes of identifying the source of infection and preventing onward transmission;
- Undertaking site visits and applying control and preventive interventions;
- Managing the collection and submission of faecal samples;
- The collection, analysis and reporting of data relating to food poisoning;
- The investigation, management and control of outbreaks of communicable disease where food or water is, or is thought to be, the vehicle of infection.
- Taking the lead on, and contributing to, local and national communicable disease initiatives and surveillance programmes, examples have included the Campylobacter Good Practice Statement, Hepatitis E and E. coli O157 national surveillance programmes.

For all sporadic cases and small, or medium size outbreaks (up to 50 cases), the staffing resources provided by the Communicable Disease, Health and Safety Team are sufficient, however for larger outbreaks, other staff within the Service would be available for interviewing cases and collection of specimens. For certain outbreaks comprising a significantly greater number of cases, or cases of greater severity or longevity, Environmental Health staff based in other teams would be trained and used in the data gathering and investigation process.

Campylobacter is the most common cause of food poisoning in the UK and many developed countries around the world. Most cases are sporadic and food borne outbreaks are rare. A number of risk factors are known to be associated with Campylobacter infection. The most common risk factor is poultry and in particular, the consumption of undercooked chicken and commercially prepared chicken. Other less common risk factors include dairy and other animal products, consumption of untreated or contaminated water, contact with animals, both domestic and farm, home sewerage problems and also travel abroad underlying medical problems such as diabetes and reduced gastric acidity also can increase the risk of infection. More recently identified risk factors associated with cases of this illness have been consumption of raw milk; feeding pet animals raw food (meat) and the practice of washing raw chicken packaging for recycling (where the bacteria becomes splashed onto adjacent surfaces and subsequently transferred onto hands, ready-to-eat foods or other equipment).

Campylobacter remains an important public health risk. The pathogen has multiple risk factors in addition to having a low infective dose, meaning that a person only needs to be exposed to a small amount of the bacteria to become ill. It is therefore critical that the communicable disease service

retains the requisite level of resource to be able to effectively investigate all confirmed cases in a timely manner.

All cases notified to the Service are contacted and interviewed primarily by phone and occasionally by face to face interview. Interview questions relate to exposures within the 10 days prior to the onset of illness and include clinical and demographic information, food history and environmental exposures, foreign and domestic travel, and with regard to chicken domestic food preparation and purchasing practices and commercial dining locations. A full report on the risk factors associated with Campylobacter Infection in Bridgend, Cardiff and the Vale of Glamorgan in 2021 can be found in the Communicable Disease and Health Protection Service Plan 2022/23.

Other commonly reported cases of food poisoning include Salmonella, Cryptosporidium, Giardia, E.coli 0157, Hepatitis E and Listeria. Investigations of these pathogens vary in complexity and control and preventive measures involve a diverse application of interventions for example identifying high risk activities such as food handlers, health care workers, child care workers, environmental sampling and sampling of close contacts and applying control measures such as exclusion from work, restricting employment and leisure activities, closure of business activities and training. Timely investigation is thus critical to the control and containment of these infections.

Outbreaks - In addition to the ongoing investigation of sporadic cases of food poisoning the service also identify and investigate outbreaks. An outbreak is defined as illness affecting two or more people who share a common exposure factor linked by time, place or person. Typically outbreaks are commonly caused by suspected Norovirus and the most common mode of transmission associated with these is either person to person or environmental contamination rather than foodborne transmission. Considerable work is undertaken to support educational and care home settings, particularly during the winter months to minimise the disruption caused by these viral infections. Norovirus infections are difficult to prevent in semi enclosed settings but their longevity and level of disruption can be greatly reduced with early intervention and application of effective public health measures.

Based on previous year's demand, it is estimated that the team will undertake the following investigations during 2022.

Communicable Disease Intervention Plan 2022				
Туре	Number of Interventions estimated at start of year based on those received in the previous year (2021)			
	Bridgend	Cardiff	Vale of Glamorgan	
Total No. of food poisoning notifications	52	192	46	
No. of food related outbreaks	2	2	0	
Total	54	194	46	

The above figures are based on previous years demands only and are likely to increase as Covid-19 restrictions are lifted.

## 3.7 Feed/Food Safety Incidents

The Service will on receipt of any food alert respond in accordance with the Food Safety Act Food Law Code of Practice and Practice Guidance.

A Product Withdrawal Information Notice or a Product Recall Information Notice is issued where a solution to the problem has been put in place – the product has been, or is being, withdrawn from sale or recalled from consumers, for example. A Food Alert for Action is issued where intervention by enforcement authorities is required.

Alerts requiring substantial reactive action will occur occasionally and irregularly. Sufficient resources will be allocated to deal with each warning as it arises, although this may require diversion from the planned programme of inspection.

If the Service becomes aware of a feed hazard we will take action to protect public and animal health at the earliest opportunity and in any event by the next working day. An assessment will be carried out to determine the likely scale, extent and severity of the risk, involving other agencies as appropriate. Enforcement options include, if necessary, detaining or seizing the feed concerned. The Service will on receipt of any feed alert respond in accordance with the Feed Law Code of Practice and the Food Standards Agency.

Dealing with feed safety incidents includes the effective response to Feed Alerts issued by the FSA and ensuring that any action specified by the FSA is undertaken promptly and with sufficient resources.

## 3.8 Liaison with other organisations

Liaison is an appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations.

The main liaison arrangements in place and regularly used are as follows:-

- Food Standards Agency
- Directors of Public Protection Wales Food Safety Expert Panel; Communicable Disease Expert Panel; Wales Heads of Trading Standards Food Panel; Food and Agriculture Panel
- Directors of Public Protection Wales Regional Liaison Group, the Glamorgan Group Food Panel, the all Wales Feed Group; Food and Agriculture Group; South West Wales and South East Wales Food Safety Task Groups, South West Wales Communicable Disease Task Group, Welsh Food Microbiological Forum, Wales Food Hygiene Rating Scheme Implementation Group.
- Liaison with professional bodies such as the Chartered Institute of Environmental Health, the Royal Society of Health, the Royal Institute of Public Health and Hygiene, the Chartered Institute of Trading Standards; Public Health Wales, Care Standards Inspectorate for Wales.
- Office for Product Safety and Standards
- Advisory groups, e.g. Food Hygiene Focus Group.
- Liaison with other Council services such as Business Rates, Planning and Building Control to inspect and review applications, Procurement and Schools Service;

- Liaison with the PH Wales Environment Sub Group and the Infection Control Committee and the Cardiff Health Alliance;
- Maritime and Coastguard Agency and stakeholders at the port including port operators;
- Directors of Public Protection Wales Port Health Expert Panel;
- Association of Port Health Authorities and the Ports Liaison Network;
- Welsh Government;
- Local Government Data Unit
- Cardiff International Airport and stakeholders at the airport including UK Border Force, airline operators, baggage handlers
- Public Health Wales including Consultants in Communicable Disease Control, microbiologists, laboratories at Llandough, Princess of Wales, Singleton and the Heath Hospitals
- Local Health Boards
- Animal and Plant Health Agency
- Centre for Radiation and Chemical & Environmental Hazards
- Crown and Magistrates Courts
- Public analyst laboratories, Minton Treharne and Davies, Cross Hands and Cardiff

## 3.9 Food and Feed Safety Promotion

Shared Regulatory Services is committed to promoting a positive food safety culture through a variety of channels. Promotion of food and feed safety will generally involve:-

- Provision of advice and information to businesses and members of the public through inspections, complaints and notifications;
- Provision of Food Hygiene training courses at both Level 2 and 3, and HACCP;
- Delivery of Food Safety Management and Safer Food Better Business training;
- Provision of training courses in other languages based on local need;
- Leaflets covering food and feed issues;
- Participation in national events such as Food Safety Week;
- Promotion of Food Hygiene Rating Scheme;
- Guidance to assist businesses;
- Advice through Shared Regulatory Services website and other social media;
- Targeted education, advice and seminars.
- Where possible interventions and promotional activities are evaluated to learn how they can be improved for next time.
- Healthy Options Awards.

## 4. Resources

## 4.1 Financial allocation

The estimated financial expenditure on food and feed safety for 2022/23 is demonstrated in the following table. Legal charges are part of a central recharge and cannot be separately calculated.

Investment in and renewal of information technology assets is funded centrally following a bid process based on the development of a business case.

	Budget 2019/20	Budget 2020/21	Budget 2021/22		Budget	2022/23	
	Bridgend Cardiff Vale of Glam	Bridgend Cardiff Vale of Glam	Bridgend Cardiff Vale of Glam	Bridgend	Cardiff	Vale of Glamorgan	Total
Staffing	3,019,200	2,142,885	2,126,294	445,343	1,178,244	445,343	2,068,929
Travel / Subsistence	62,070	33,375	34,410	£6441	£16,029	£5905	£28,375
Sampling	72,710	34,320	34,321	£7725	£19,224	£7082	£34,030
Supplies and services	140,140	71,645	74,010	£14,955	£37,216	£13,710	£65,880
Income	-	-20,000	-20,000	-£443	-£1102	-406	-£1950
TOTALS	3,294,120 This figure relates to the entirety of the teams involved in food. This figure does not reflect the allocation to food only	2,262,225	2,249,035	474,201	1,249,610	471,633	2,195,264

Prior to 2020/21, the budget presented for food and feed safety included the figures relating to the entirety of the teams involved in food and feed and not the actual allocation to food and feed work included in this plan. This had the effect of presenting an inflated budget in the plan, through the inclusion of services and FTE that did not discharge these functions. Efforts were made however to calculate a more accurate figure representative of the budget assigned to the food and feed service which resulted in a significant reduction compared to previous years. We continue to use this method of calculation for 2022/23. The salary costs presented are representative of the staffing allocation outlined in section 4.2 and are costed at the top of the scale. Similarly the budget for travel/subsistence, sampling and supplies and services has been adjusted to exclude some services that were previously included. As a consequence, for example, the above budget does not include major investigations which are difficult to predict.

Notwithstanding these adjustments, it should be noted that the budget allocated to the food and feed service is declining, which presents an increasing challenge to the food service in delivering against the requirements of the Food Law Code of Practice.

Income streams do exist within the Service which offset some of the expenditure on food and feed safety. These include the delivery of training, paid for advice and Primary Authority partnerships. Additional income is also provided through fees payable for re-scores and grants provided for promotional work.

## 4.2 Staffing allocation

The table below summarises the estimated number of posts required to meet the demands placed on the Food and Feed Service and deliver the core functions within. Staff numbers are shown in terms of full time equivalent posts (FTE).

	Brid	Bridgend		Cardiff		Vale		Total [FTE]	
Function	Food Safety	Food Stds	Food Safety	Food Stds	Food Safety	Food Stds	Food Safety	Food Stds	
Premises Interventions	5.5	0.4	13.5	1.1	5.5	0.4	24.5	1.9	
Food & Feed Hygiene Complaints	0.75	0.01	1.9	0.1	0.75	0.01	3.4	0.12	
Home/Primary Authority	0.15	0.1	0.5	0.5	0.15	0.1	0.8	0.7	
Advice to Business	0.5	0.1	1	0.4	0.5	0.1	2	0.6	
Food and Feed Sampling	0.40	0.65	0.9	1.15	0.40	0.65	1.7	2.45	
Food Poisoning	0.2	0	1	0	0.2	0	1.4	0	
Food and Feed Safety Incidents	0.15	0.05	0.47	0.55	0.15	0.05	0.77	0.65	
Liaison	0.08	0.03	0.27	0.05	0.08	0.03	0.43	0.11	
Food & Feed Safety/ Standards Promotion	0.2	0.01	0.9	0.05	0.2	0.01	1.3	0.07	
Management	0.72	0.22	1.55	0.44	0.72	0.22	2.99	0.88	
Total Professional	8.65	1.57	21.99	4.34	8.65	1.57	39.29	7.48	
Administration	2	0.18	4.25	0.35	2	0.18	8.25	0.71	
Overall totals [FTE]	10.65	1.75	26.24	4.69	10.65	1.75	47.54	8.19	

The tables below indicate the actual number of people resourced to work on Food and Feed safety and related matters (in terms of full time equivalents FTE) at 1<sup>st</sup> April 2022. It should be noted that this resource has been significantly reduced, due to a number of employees (4.8 FTE) being repurposed to support the Test, Trace, Protect Scheme, 2 FTE on long term sick and 4 vacancies. So while SRS is resourced for **38.34 FTE** to undertake Food and Feed Standards work, in practice this is significantly less. Levels of qualification are expressed with reference to the appropriate Food Safety Act Food Law Code of Practice and Practice Guidance and Feed Law Code of Practice, including support staff.

Successful delivery of the service plan is dependent on adequate staffing resources being maintained during the plan period. To deliver the full programme in accordance with the FSA requirements this would require additional resource over the existing budget. The additional resources required are highlighted beneath the following current resource tables.

Due to the backlog of food hygiene inspections that accrued as a result of the pandemic, contractors have been recruited to undertake additional food hygiene inspections to provide a temporary additional resource which are not included below.

n. di		od Safety			
Position	Function	Qualification	Bridgend	FTE Cardiff	Vale
			briugeriu	Carum	Vale
Head of Shared Regulatory Services	Management of Environmental Health, Trading Standards and Licensing functions	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.02	0.06	0.02
OM Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	of public protection functions - food hygiene, port health and food poisoning and  Health, Diploma in Trading Standards (DTS)		0.15	0.075
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team  BSc Environmental Quality and Resource Management  Management  Management  Management  Environment Team		0.04	0.02
Team Manager (Food and Port Health)	Food safety management and liaison.	fety Environmental Health ement and Officer (EHORB		1.00	0.45
Team Manager (Health & Safety and Communicable Disease Team)	Community Health including food poisoning and liaison	Environmental Health Officer(EHORB registered)	0.06	0.12	0.06
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification. MSc. Environmental Health	0.1	0.2	0.1
Commercial Services Officers (Food and Port Health)	Food safety inc. 2 FTE for Port Health	Degree in environmental health or other suitable qualification required under the Food Law code of Practice.	4.02	12.77	4.02
Commercial Services Officers (CD)	Community health (food poisoning and infection control )	Degrees in in Environmental Health or equivalent science	0.21	0.43	0.21
Commercial Services Officer ( Industry)	Food Safety & Food Standards at Manufacturing/Industria I Premises including EH Approvals	Degree in environmental health or other suitable qualification required under the Food Law code of Practice.	0.78	1.55	0.78
Technical Officer (Food and Port Health)	Food safety and port health	Degree in environmental health or other suitable qualification required	0.45	1.90	0.45

		under the Food Law code of Practice.			
Technical Officer (CD)	Community health including food poisoning	Degrees in in Environmental Health or equivalent science	0.04	0.08	0.04
Commercial Services Officer (Business Engagement and Training) industry	Food Safety & Food Standards at Manufacturing/Industria I Premises	Ordinary & Higher Certificates in Food Premises inspection, Higher Certificate in Food Control	0.25	0.5	0.25
		Total Professional staff	5.33	16.30	5.33
		Overall total professional staff (including vacant posts, long term sick and re-purposed posts.		31.75	-

In terms of food safety, while the service is resourced for 31.75 FTE professional staff, of these 4.8 FTE are currently re-purposed to work on Test, Trace and Protect, 2 FTE are on long term sick and the service has 2 vacancies reducing that resource significantly by 8.8 FTE. Even if all posts were fully occupied and operational, there would still remain a shortfall of **7.54 FTEs** needed to meet the demands placed on the Food Safety service and deliver the full Food Safety programme in accordance with the Food Law code of Practice and participate in all surveys with other local authorities.

Food hygiene officers have begun undertaking food standards inspections within prescribed premise types which are completed alongside the food hygiene inspection. As such the above table also contributes to the resource provided to food standards enforcement.

	Food Standards									
Position	Function	Qualification		FTE						
			Bridgend	Cardiff	Vale					
OM Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	MSc Environmental Health, Diploma in Trading Standards (DTS)	0.05	0.1	0.05					
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	BSc Environmental Quality and Resource Management	0.02	0.04	0.02					
Team Manager (Trading Standards)	Management of Commercial Services Trading Standards Team includes Food Standards and Feed Hygiene functions.	Diploma in Consumer and Trading Standards, MSc Environmental Health	0.05	0.2	0.05					

		Overal total professional FTE including vacant posts.	5.90		
		Total Professional FTE	1.5	2.9	1.5
Technical Officer (Food & Port Health)	Food safety in retail premises.		0.05	0.10	0.05
Technical Officer ( Trading Standards)	Food standards and feed hygiene functions	DCATS Food and Agriculture module or equivalent.	0.09	0.18	0.09
Commercial Services Officer (Food & Port Health)	Food safety in retail premises.	Degree in environmental health or other suitable qualification required under the Food Law code of Practice.	0.18	0.28	0.18
Commercial Services Officer ( Industry)	Food Safety & Food Standards at Manufacturing/Industria I Premises including EH Approvals	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).	0.28	0.55	0.28
Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.  Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).		0.68	1.35	0.68
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification, MSc. Environmental Health.	0.1	0.1	0.1

There is shortfall of officers to meet the Food Standards inspection programme in accordance with the Food Law Code of Practice based on the same number of premises for Food Standards and Food Safety. It is recognised however, that such an increase in the number of officers required within this area is not financially viable for the service and consequently officers enforcing Food Safety were provided with training enabling them to enforce Food Standards legislation. This enables a multi skilled approach to the enforcement of food during 2022/23. In relation to high risk premises and referrals for non-compliances for the purpose of Food Standards, enforcement will remain with the Trading Standards teams. While the food standards work is resourced for 5.90 FTE, the service currently has 2 full time vacancies reducing the food standards resource by 1 FTE. Even if all posts were fully occupied and operational, there would still be an estimated shortfall of 1.58 FTE's to meet current demands and deliver the full Food Standards programme in accordance with the Food Law code of Practice and participate in all surveys with other local authorities. It is envisaged however, that as more Food Safety Officers receive the necessary training, this figure may be reduced.

	Fee	d Safety				
Position	Function	Qualification		FTE		
			Bridgend	Cardiff	Vale	
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	BSc Environmental Quality and Resource Management	0.01	0.02	0.01	
Team Manager (Trading Standards)	Management of Commercial Services Trading Standards Team includes Food Standards and Feed Hygiene functions.	Diploma in Consumer and Trading Standards	0.0025	0.01	0.0025	
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification, MSc. Environmental Health.	0.0067	0.0067	0.0067	
Team Manager ( Environment)	Management of Animal Health and Welfare Team	BSc, Environmental Health, Animal Health and Welfare Qualification	0.04	0.03	0.04	
Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).	0.05	0.1	0.05	
Commercial Services Officer ( Industry)	Food Safety & Food Standards at Manufacturing/Industria I Premises including EH Approvals	Environmental Health Officers & Trading Standards Officers	0.02	0.02	0.02	
Animal Health & Welfare Officers	Feed hygiene on farm including sampling	Competency achieved through training, monitoring and assessment	0.10	0.046	0.010	
		Total Professional FTE	0.23	0.23	0.0.23	
		Totals				
		Overall Total (FTEs)		0.693	0.0067 0.0067 03 0.04 0 0.05 02 0.02 046 0.010	

There is no shortfall of Officers to meet the Feed Hygiene programme.

## 4.3 Staff Development Plan

Shared Regulatory Services approach to managing staff development is through the production of a Workforce Development Plan that provides a plan for developing the workforce to ensure the workforce has and maintains the right mix of experience, knowledge and skills required to fulfil our goals.

The Workforce Development Plan, providea a framework that addresses wide ranging issues and bring together the following areas:-

- Developing organisational culture
- Leadership and management development
- Skills development
- Recruitment, retention and progression
- Communication and employee engagement
- Employee performance management

Continuing Professional Development (CPD) is actively encouraged and officers attend a wide range of training courses, seminars, meetings and briefings to help maintain competency and improve technical, legal and administrative knowledge. The new Food Law Code of Practice requires a minimum of 20 hours CPD to be completed by all authorised officers. The Chartered Institute of Environmental Health and the Chartered Trading Standards Institute have mechanisms in place to monitor CPD of its members requiring 20 hours a year to be met for normal membership and 30 hours a year for chartered membership.

Regular food safety and standards training is carried out in house. At least one internal training session will take place each year.

All officers receive training in respect of new food and feed legislation and how it relates to establishments involved in the supply of products of animal and non animal origin. This is an ongoing process and officers will receive further training and guidance as required.

The Service also recognises the need for full technical support to be available to all Food and Feed Officers and this is achieved through a variety of ways, including internet subscription and library.

## 5. Quality Assessment

Shared Regulatory Services recognises the need to measure the effectiveness of its food and feed safety duties and strongly supports the ethos of continuous improvement. The Service therefore participates and undertakes a number of activities to ensure that work is of a high standard and opportunities to identify and implement improvements are taken.

#### **Documented procedures**

To ensure the quality and consistency of our activities, processes, procedures and work instructions for Food and Feed enforcement activities are documented within each local authority area. To ensure the quality and consistency of our activities and in accordance with the Food Standards Agency Framework Agreement, consistent procedures have been developed to harmonise the processes, and work across Shared Regulatory Services and are available to all Shared Regulatory Services staff.

Documented procedures identify responsibility for the work carried out and ensure that all changes identified through audit are carried out in accordance with improvement procedures. .

#### Assessment and audits

The monitoring of the quality of our policies and procedures is assessed in a number of ways, namely:-

- Internal audit of documented procedures and work instructions;
- Audits undertaken by the Food Standards Agency.
- Customer consultation and feedback;
- Review of corporate complaints and compliments about the service.

In March 2017 an Audit was completed by the Food Standards Agency Wales of the delivery of official food controls in Shared Regulatory Services. This identified recommendations for incorporation into the Service to ensure best practise.

#### **Customer consultation and feedback**

We are committed to involving customers in the continuous improvement of services and recognise the need to have structured methods of obtaining service users views and perception of the service. The service sends a link to an online survey questionnaire to all food business operators across the SRS region following each planned food hygiene inspection visit asking a series of questions to gauge the business's satisfaction with the services they received and the impact the inspection has had on the business.

## 6. Review

## 6.1 Review against the Service Plan

It is the policy of Shared Regulatory Services to review performance against the Service Plan on an annual basis, supported with regular monitoring of performance measures to ensure continuous improvement throughout the year. Shared Regulatory Services has an effective performance management infrastructure in place for developing, delivering, monitoring and reviewing interventions which is undertaken through the following mechanisms:-

- The Joint Committee for the Shared Regulatory Service will approve this Service Plan setting out the work programme for the service and reviewing performance against the previous year's programme.
- Performance of the service is considered at team and management meetings on a monthly basis. Performance against strategic and local Performance Indicators is reviewed through a framework of management review meetings.
- Team and Food Service meetings allow for the effective management of work and are also one of the routes of communication that allow individual and team involvement in the development and delivery of interventions.
- Performance of individuals is managed through the #itsaboutme Scheme performance appraisal detailed in Section 4.
- Procedures and work instructions will be managed through a Shared Regulatory Service document control system.

## 6.1.1 Review of Food Hygiene Interventions 2021/22

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work and performance. The following sections identify those planned interventions due at the beginning of 2021/22 for Food Hygiene and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions, together with those that were actually undertaken and the overall % achievement. It should be noted that whilst the programme changes throughout the year as businesses close and new businesses open, the completion of the programme during the last year was affected by lack of resource within the Food teams, as individuals were redeployed to roles within Test, Trace, Protect. The percentage achieved relates to performance at the end of the year as the programme has developed.

	Food Hygiene Intervention Plan 2021/22									
R	lisk Category						of year (i			klog)
			Bridgend			Cardiff		Vale	of Glamo	organ
		Due	Actual	%	Due	Actual	%	Due	Actual	%
		start of year	completed	programme achieved at end of year	start of year	completed	programme achieved at end of year	start of year	completed	programme achieved at end of year
¥	А	4	5/5	100%	14	10/10	100%	6	4/4	100%
HIGH RISK	В	0	18/48	37.50%	0	134/135	99.26%	0	20/51	39.22%
HIG	С	0	50/484	14.25%	0	82/1100	7.45%	0	25/452	5.53%
	High Risk Total	4	73/537	13.59%	14	226/1245	18.15%	6	49/507	9.66%
MO	D	0	2/186	1.08%	0	70/422	16.59%	0	10/162	6.17%
MEDIUM-LOW RISK	E/AES*	306	76/290	26.21%	571	152/515	29.51%	253	74/236	31.36%
MED	Medium to low Risk Total	306	78/476	16.39%	571	222/937	23.69%	253	84/398	21.10%
SES	Unrated (New business at 1 April)	223			712			226		
NEW BUSINESSES	Unrated (New business identified during year)	Est 248	203/ 317	64.04%	Est 667	563 /985	57.16%	Est 224	228/ 352	64.77%
R	Total unrated	471	203	64.04%	1379	563	57.16%	450	228	64.77%
REVISIT	Re-visits	Est 19	32	N/A	Est 149	273	N/A	Est 24	51	N/A
ТОТА	LS	Est 800	386		Est 2113	1284		Est 733	412	

#### **High Risk Food Business (A – C Rated)**

In line with the FSA Recovery Plan, 100% of all A rated premises due an intervention received an intervention. B and C rated premises were not prioritised during 2021/22 however, despite no interventions being planned for this type of premises, a number of interventions were conducted as can be seen from the table above.

The term high risk premises includes those businesses rated as:-

- category A (those premises requiring a visit every six months)
- category B (those premises requiring an annual visit)
- category C (those premises requiring a visit every 18 months)

#### D and E rated food businesses

Due to the need to prioritise A rated food premises and new businesses during 2021/22 in line with the FSA recovery plan, D and E rated food businesses were not prioritised. Notwithstanding this, a small number of interventions did take place which is reflected in the table above.

#### **Inspection of New Businesses**

As many as one in three UK businesses fail in the first three years. Establishing contact with new businesses in their first year of trading is an important part of the SRS strategy to promote and support the local economy. Early engagement with a business helps us to protect the public health and allows the SRS to work with food businesses and provide them with the opportunity to understand legal requirements.

Cardiff has a high turnover of business ownership which presents a challenge for the service, over and above the routine inspection programme. During 2021/22 a total of 900 new business were identified across the region, with 529 of these being in Cardiff representing 58.77% of new businesses across the three areas. In Bridgend and the Vale of Glamorgan 166 and 205 new businesses were identified in each area. Pre-pandemic, a backlog already existed, which has now increased significantly as a result, however priority will be given to these inspections during 2022/23 in accordance with the FSA Recovery Plan.

#### **Food Hygiene Revisits**

Inspection of food businesses often requires follow up visits to ensure compliance with food safety requirements. The intervention and revisit procedure requires that all businesses rated 0 are revisited within 28 days and all those rated 1 or 2 are revisited within 3 months. The number of revisits is difficult to predict, and is determined by the number of full inspections undertaken and the compliance of the business at the time of inspection.

#### Appeals

Food businesses have a right under Section 5 of the Food Hygiene Rating (Wales) Act 2013 to appeal the food hygiene rating given to the establishment if, they do not agree that the rating properly reflects the hygiene standards found at the business at the time of the inspection or that they believe that the rating criteria was not applied correctly when producing the rating. Businesses have 21 days from the date of receipt of the notification letter to lodge an appeal and similarly businesses should receive the outcome of the appeal within 21 days from the date the appeal was received. During the last year SRS received 20 appeal applications (Bridgend 2, Cardiff 15 and Vale 3) .

#### **FHRS Re-scores**

In addition to appeals, food business operators also have a right to request a rescore inspection for the purpose of re-rating under the Food Hygiene Rating Scheme. This request can be made anytime after the statutory inspection, provided that businesses have made the required improvements. In these circumstances, SRS are permitted to recover costs for such an inspection and charge a fee accordingly and are required to undertake a re-visit within 3 months. During 2021/22, 105 re-score applications were submitted (1 in Bridgend, 103 in Cardiff and 1 in the Vale), and 137 re-score inspections carried out (11 Bridgend, 112 Cardiff and 14 in the Vale of Glamorgan).

#### **Inland Imported foods**

During the inspection of food businesses, officers consider the origin of imported foods. Any indications that food may not have been subject to correct import controls are investigated and, where necessary, the food is removed from the food chain.

#### **Food Safety Projects**

In addition to routine inspections of food businesses, SRS typically participates in a number of planned food safety surveys which entail various sampling programmes across a range of businesses. Due to lack of resources as a result of the Covid-19 pandemic together with recruitment issues, these activities were limited during 2021/22, however the following projects did take place.

**Food Hygiene Inspection Exercise** — As hospitality began to re-open from lockdown, an exercise was initiated to target areas with high concentrations of food businesses to tackle poor compliance. These included City Road in Cardiff, Holton Road in Barry and Nolton Street in Bridgend. All food officers from across the different teams worked together in each area to make targeted unannounced inspections of food businesses. In total over 110 inspections were made across the 3 areas resulting in 4 voluntary closures of businesses, 2 voluntary surrenders of food and the issue of a fixed penalty notice for the non display of a food hygiene rating sticker. These exercises brought benefits in terms of maximising the number of inspections carried out through targeted enforcement, and provided greater integration of disparate teams who were able to support one another, develop new relationships and get an appreciation of the restraints and demands in each other's areas.

**Food Hygiene Rating Scheme Display Project** – This project was not completed during 2021/22. This was due to lack of resources, resulting from staff being re-directed to respond to the covid pandemic and the need to prioritise high risk businesses during the year.

**Shopping Basket Survey** - This project was not completed during 2021/22. This was due to lack of resources, resulting from staff being re-directed to respond to the covid pandemic and the need to prioritise high risk businesses during the year.

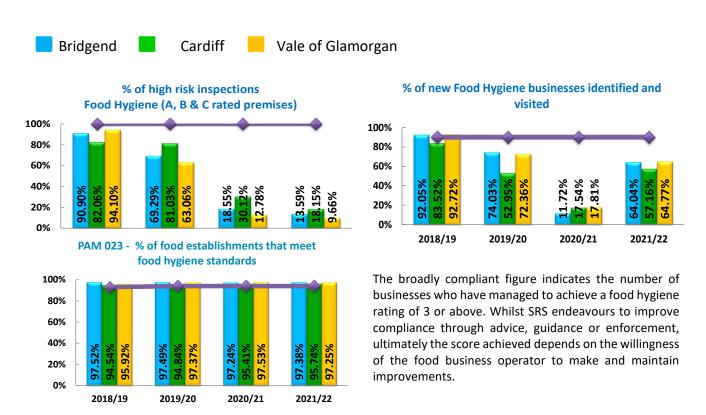
**Food Safety Training Expansion** - SRS has further expanded the training being offered for businesses and now delivers training both face-to-face and online, to provide more choice and flexibility for food businesses. The range of courses offered has also been expanded to include the Level 3 Award in Food Allergen Management in Catering and the Level Four Award in Managing Food Safety in Catering courses. One-to-one or group bespoke training, tailored to the needs of the business, is also available.

Managing E.coli risk within the Council - The partner councils all have a role in procuring and providing food to a range of establishments. Significant progress has been made to address the E.coli risk at Cardiff Council. The impact upon the overall compliance of the Council establishments at Cardiff has been significant and the Service has now begun to extend this regime to the other

partner councils. The Operational Manager continues to sit on this group on a quarterly basis providing updates and key information relating to Council owned food premises.

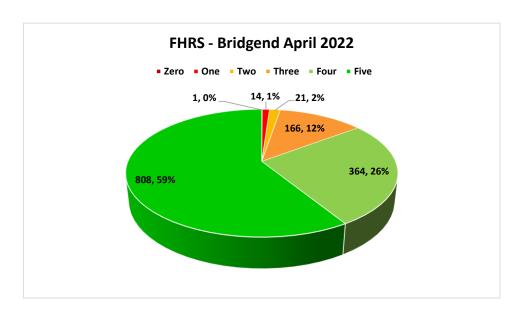
#### **Performance Measures**

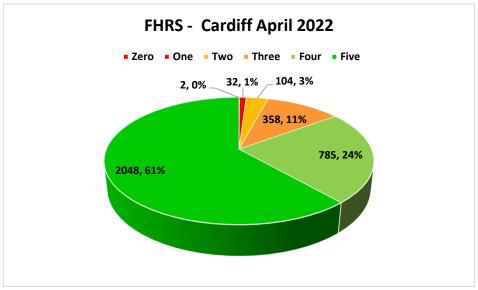
The only current Public Accountability Measure relevant to Food Safety is PAM/023, however other performance indicators such as service improvement data are collected. The following graphs show the results for the last 4 years.

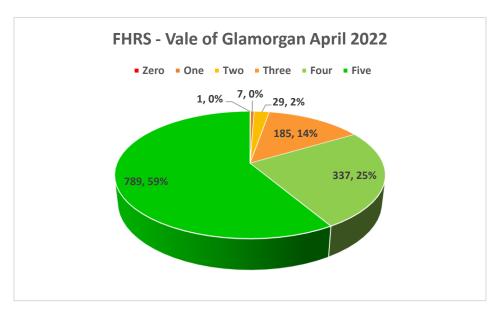


Broadly compliant businesses and the Food Hygiene Rating Scheme - In November 2013 a statutory food hygiene rating scheme was introduced throughout Wales where on receiving a food hygiene inspection, premises receive a hygiene rating from zero to five. Businesses with a food hygiene rating of 3 and above are classed as broadly compliant in meeting food hygiene standards and the graph above (PAM 023) shows the percentage of food businesses that meet this criteria across the region over the last 4 years. The number of food businesses with a food hygiene rating of more than 3 continues to remain at a high level with 97.38% in Bridgend, 95.74% in Cardiff and 97.25% in the Vale of food businesses being broadly compliant. The results show a stabilisation over recent years exceeding targets and highlighting the growing number of businesses that are improving their standards, which can be attributed to the success of the intervention programme for food businesses. That programme ensures that any food safety issues identified are followed up by either enforcement, advice or training and subsequently revisits to ensure compliance with food safety law.

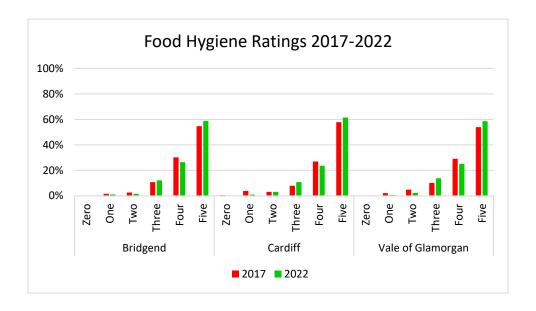
The following charts highlight the ratings of businesses across the region . A breakdown of the scores across Bridgend, Cardiff and Vale of Glamorgan can be found below.







The Scheme has had a positive impact in improving standards in food businesses and the following graph demonstrates how over a 5 year period the percentage of businesses that have a '5' rating, the highest rating that can be achieved, has increased while the number of low scoring businesses has dropped. It is hoped that the return to the intervention programme required by the Food Law Code of Practice will continue to see this trend maintained, but unfortunately early indications suggest that there has been a demise in compliance with food safety at food businesses due to the suspension of interventions during the covid pandemic.



#### **Customer Satisfaction**

During 2021/22, the service discontinued the use of paper questionnaires seeking customer feedback on the inspection process, which had typically been sent out with letters following an inspection. Instead a link was provided within the letter to access an online survey. Disappointingly the response to the survey has been extremely poor with insufficient responses received to provide results for 2021/22. However, of the few responses received, customer feedback was positive with respondents indicating they were able to access the services they needed from SRS and were very satisfied with the service they received.

#### Prosecutions and enforcement action

SRS is committed to enforcing the laws we regulate, instigating legal proceedings against those businesses or individuals that flout the law. During 2021/22, the service successfully prosecuted 6 individuals/businesses in relation to food offences and the following cases showcase a few selected examples.

Company/owner of Cardiff convenience store fined £20,000 for a string of food hygiene
offences – In this case, officers found dreadful conditions on the premises including a dead
mouse, cockroach infestation, unwrapped raw meat being stored next to fresh herbs and
vegetables and out of day and mouldy foods. The defendant had been prosecuted previously

for food hygiene matters and also for the supply of illegal tobacco, so knew the serious nature of the offences. The company of which the store owner was the director was given a total fine of £20,000, and the owner sentenced to a total of 13 months imprisonment and issued with a Hygiene Prohibition Order preventing him from participating in the management of any food business.

• Bridgend takeaway fined for 8 food hygiene offences – In another case, an inspection of a take-away in Bridgend discovered a number of food hygiene offences including a failure to ensure the premises were kept clean, failure to implement and maintain procedures based on HACCP principles, failure to provide sufficient washbasins and failure to ensure that food, cooking utensils and raw materials were kept clean to avoid cross contamination. In view of the serious incidents, the defendant was fined a total of £1760, ordered to pay costs of £1100 and a victim surcharge of £176.

In addition to legal proceedings, the following enforcement actions were undertaken:-

Food Hygiene Enfor	Food Hygiene Enforcement Actions 2021/22							
Туре	Bridgend	Cardiff	Vale of Glam					
Voluntary closure	3	15	2					
Seizure, detention and surrender of food	1	5	1					
Suspension/revocation of approval or	0	2	1					
licence								
Hygiene Emergency Prohibition Notice	0	0	0					
(Formal)								
Prohibition Order	0	0	0					
Simple caution	0	2	0					
(Hygiene )Improvement notice	1	11	2					
Remedial action and detention notices	2	7	0					
Written Warnings	254	788	260					
Prosecutions concluded	1	3	2					

## **6.1.2** Review of Food Standards Interventions 2021/22

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following sections identify those planned interventions due at the beginning of 2021/22 for Food Standards and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions, together with those that were actually undertaken and the overall % achievement. The number of interventions due fluctuates during the year as premises close and new businesses open. The % achievement therefore represents those that were due and which were carried out throughout the year, rather than against those that were due at the beginning of the year. It should be noted that the Covid pandemic and resulting business closures and suspension of inspections did have an impact on performance due to the backlog created as a result.

Food Standards Intervention Plan 2021/22										
Risk Category	Nun	nber of Ir	nterventi	ons due	at start o	of year (i	ncluding	any back	dog)	
	Bridgend				Cardiff		Vale	Vale of Glamorgan		
	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	%  programme  achieved  at end of  year	Due start of year	Actual completed	%  programme achieved at end of year	
High Risk	5	1/3	33.33%	15	7/12	58.33%	0	0/0	N/A	
Medium Risk	0	33	N/A	0	196	N/A	0	22	N/A	
Low Risk	0	33	N/A	0	119	N/A	0	17	N/A	
New Business	Est 413	170/301	56.48%	Est 1170	216/954	22.64%	Est 450	167\428	39.01%	
Unverified businesses Errors within the database on set up	68	40	58.82%	517	273	52.80%	10	5	50.00%	
Re-visits	2	6	N/A	14	5	N/A	1	0	N/A	
Total	488	283		1716	816		461	211		

#### **High risk interventions**

During 2021/22 33% of the inspection programme was achieved in Bridgend, and 58.33% in Cardiff. No inspections were due in the Vale of Glamorgan. This represented 7 visits outstanding at the end of the year. In line with the FSA Recovery Plan these outstanding inspections will be completed by the end of June 2022, the timeline for completing high risk food standards interventions.

#### **Medium and low risk interventions**

During 2021/22 the food standards element of the service was resourced to only deliver an inspection programme for high risk and new businesses in line with the FSA Recovery Plan. As previously described, however, food hygiene officers trained in food standards facilitates the completion of food standards inspection at the same time as the food hygiene inspection generally in respect of medium to low risk premises.

As a result of this new way of working, no target was set at the beginning of the year, however through this method of intervention, the service undertook 66 interventions in medium and low risk businesses in Bridgend, 315 in Cardiff and 39 in the Vale of Glamorgan. This was an increase on the previous year which had been impacted due to the suspension of inspections as a result of the Covid pandemic.

#### **New Businesses**

Early engagement with a business helps us to protect the public health and allows the SRS to work with food businesses and provide them with the opportunity to understand often complex legal requirements.

Cardiff has a high turnover of business ownership which presents a challenge for the service, over and above the routine inspection programme and this was further exacerbated by the Covid-19 pandemic which saw businesses close and inspections suspended. Furthermore officers were redirected to covid enforcement work, all of which impacted on performance in this area creating a backlog as we entered 2021/22.

The Food Law Code of Practice requires new businesses to be inspected within 28 days, which can become challenging due to food businesses often registering with the service but not ready to trade within the 28 days. It was previously envisaged that the new way of working relating to food hygiene officers undertaking food standards inspections described above would result in an increased amount of inspections of new businesses, however we have not yet been able to see evidence of this due to the impact of the Covid-19 pandemic on the service during the last year.

#### **Unverified businesses**

Univerified businesses are those businesses recorded on the SRS database that have yet to be rated. Unlike new businesses which are also unrated, these are business records that when transferred from our former database to the new Tascomi database contained errors. Work has been carried out to remedy this situation since they were first identified with 40 businesses in Bridgend, 273 in Cardiff and 5 in the Vale of Glamorgan being rated during 2021/22. There still remains a number of unverified businesses and these will need to be addressed during 2022/23.

#### **Re-visits**

Inspection of food businesses can require follow up visits to ensure compliance with food standards requirements. The number of re-visits is difficult to forecast however an estimate is made based on the actual number carried out in the previous year. Results show that 6 re-visits were undertaken in Bridgend, 5 in Cardiff and none in the Vale of Glamorgan.

#### **Food Standards Projects**

In addition to routine inspections of food businesses, SRS participates in a number of planned food standards surveys which entail various sampling programmes across a range of businesses, these included:-

Retail Butchers inspections – 37 inspections were completed on butcher premises where
checks in relation to both food standards and weights and measures were made. Checks
were made in relation to lean mince, and meat products to assess compliance with
compositional requirements and sulpher dioxide content and QUID (quantity of certain
ingredients. Results of these inspections indicated the following:-

"Lean Mince" - 18 informal samples of mince beef described as "lean". Analysis was conducted to assess compliance with compositional requirements (>7% Fat and/or Collagen / meat protein ratio >12%):

#### **Results:**

- 4 samples were satisfactory.
- 11 were unsatisfactory as samples did not meet the compositional requirements. The majority of failures concerned the fat content exceeding 7%. The worst being Fat = 13.4%
- 3 were borderline marginal failures.

**Meat Products** - 30 meat products (18 sausages / 12 burgers) were sampled and analysis was conducted to assess compliance with compositional requirements i.e. Sausage 32%, Pork sausage 42%, Beef Burger 62:

#### Results:

- 100% of the samples met the minimum compositional requirements prescribed in law
- 7 samples however, were found to be unsatisfactory because the product was found not to contain the meat content verbally provided following a request or that declared on the label.
- 8 samples were borderline
- 13 samples were satisfactory because the product was found to contain the meat content confirmed verbally (following a request) or declared on the label.

**Sulphur dioxide** - 30 samples were analysed in respect to the Sulphur dioxide content that must be below the maximum limit of 450 mg/kg in burgers/breakfast sausage.

#### **Results:**

- 2 of the samples were found to be unsatisfactory as contained sulphur dioxide above
   450mg/kg
- 28 satisfactory as contained sulphur dioxide below 450mg/kg.

**QUID** (quantity of certain ingredients) - 30 premises were checked to see whether food business operator (offering for sale) had provided the quantity of meat expressed as a percentage on a label attached to the food, or on a notice, ticket or label at the place where the intending purchaser chooses that food

#### **Results:**

- 27/30 (90%) samples did not provide QUID for the meat content.
- Home Caterers Following an increase in the number of food businesses utilising home environments to prepare food which has increased in popularity, particularly during the lockdown period, it became evident that social media is used as a forum to advertise the sale of food. To ensure that these premises are fully registered and trading in a safe manner, the service utilised social media to identify unregistered food businesses within the region to assess compliance in relation to food standards.

Ten food business operators that had not registered their food business were identified and contacted in relation to food registration. Six of those food businesses were brought into compliance either by 'take-down' of the social media platform/posts used to promote the sale of food or as a result of the business registering their food business.

• Food Standards Sampling Programme - a number of regional projects agreed by the Glamorgan Group (GG) included a number of food samples being taken during the year, a summary of which can be found below:-

Food Matrix	Analysis	Comments	Number of samples taken	Satisfactory	Non satisfactory
Indian Take- away	Allergens - determine presence of I	Milk	Bridgend - 2	2	
away	9 premises were visited across the SRS region were asked about the suitability of food on person with an allergy to milk	-	Cardiff - 5	3	2
	Results: 4 premises refused to sell on the ba food requested contained milk. 3 samples w unsatisfactory because the food ordered did	vere	Vale - 2	1	1
	and the remaining 2 samples was satisfactor not contain milk.		Total 9	6	3
Kebabs	Allergens - determine presence of I		Bridgend - 2	2	
	6 of the premises advised that the kebab co and no sample was purchased. 10 of the pr that the kebab did not contain Milk and the	emises advised	Cardiff - 11	5	6
	sample was purchased and submitted to the analyst.  7 were unsatisfactory as were found to cont		Vale - 3	2	1
	the remaining 3 samples were satisfactory a contain Milk at a detectable level.		Total 16	9	7
Kebabs	Descriptions – lamb content	504	Bridgend - 0		
	10 samples described as "Doner Kebab" tha considers to be a customary name for a lam therefore only applied to products containing The samples were submitted to the public a	b product and ng only lamb. nalyst to check	Cardiff - 7	1	6
	for the presence of meat species other than Results: 9 of the samples were unsatisfactor as either Doner Kebabs or Lamb Doner but v contain other meat species (Beef and/or ch	ry as described were found to	Vale - 3		3
	sample had 5-10% Ovine and remainder wa Chicken. Only 1 sample was satisfactory as o Ovine.	s Beef and	Total 10	1	9
Vegan	Descriptions – Vegan samples		Bridgend - 0		
	10 premisses were visited and samples purc were described as being suitable for Vegans were submitted to the public analyst to dete	. The samples ermine	Cardiff - 8	2	6
	whether products of animal origin where pr foods. Results: 4 of the samples submitted were ur	nsatisfactory as	Vale - 2	2	
	the presence of food of animal origin was do sample was satisfactory and we are awaiting 5 samples		Total 10	4	6
Natashas Law	Allergen Labelling – Natasha's Law  Following the introduction of Natasha's Law 2021. This new amendment to existing labe		Bridgend - 2		2
	requirements required for the first time all have been pre-packed for direct Sale to having redients together with the 14 prescribed emphasised on the label.	foods that re the full list of	Cardiff - 2		2
	analyst for checks in relation to the new lab requirements. All 4 samples came back as u	•			1
	on the basis that some of the labelling requirements of non-compliant. These business will receive advice and be subject to re-visits/sampling to ensure compliance these new requirements going forwards.		Total 5		5
	As required		Bridgend - 2	1	1

Complaint	from another team (EU) or resulting from concerns during	Cardiff - 11	8	3
samples		Vale - 2	1	1
		Total 15	10	5
Formals	These were taken following failed informal samples (i.e. failed complaint sample).	Bridgend – 0		
		Cardiff – 7	7	
		Vale - 4	3	1
		Total 11	10	1

**Informal Sampling** - 13 visits were carried out where samples were obtained as a result of food complaints received by the department or to follow-up concerns identified during inspections. Most of these complaints/concerns related to the ability of food businesses to accurately identify the allergen ingredients in the food and a failure by the business to provide this to consumers on request. 8 of the samples were found to be unsatisfactory because they contained an ingredient, despite officer advising the server they were allergic to that ingredient. These businesses have been provided with written guidance and warnings in relation to the non-compliance. These businesses will also be subject to future sampling to ensure that issues identified have been addressed. 5 samples were found to be satisfactory.

In addition to the above, 8 premises were found to be able to inform the sampling officer about the presence of the allergen in the food they wished to purchase and as such no sample was obtained.

#### **Prosecutions and enforcement action**

Food Standards Enfo	rcement Actio	ns 2021/22	
Туре	Bridgend	Cardiff	Vale of Glam
Voluntary closure	0	0	0
Seizure, detention and surrender of food	0	0	0
Suspension/revocation of approval or	0	0	0
licence			
Emergency Prohibition Notice (Formal)	0	0	0
Prohibition Order	0	0	0
Simple caution	0	0	0
Improvement notice	0	0	0
Written Warnings	7	28	17
Prosecutions concluded	0	1	0

## 6.1.3 Review of Feed Safety Interventions 2021/22

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following sections identify those planned interventions due at the beginning of 2021/22 for Feed Safety and reports on the delivery of those interventions together with information on enforcement activities.

	Feed Safe	ty Inte	ervent	ion Pla	n 2021	./22		
Risk Category	Intervention Frequency				ons due at s any backlog	start of yea s)	r	
		Brid	gend	Car	diff	Vale of Glamorgan		
		Due	Actual	Due	Actual	Due	Actual	
High Risk A rated	12 mths	0	0	0	1	0	0	
Medium Risk B rated	24 mths	2	1	2	0	4	0	
Medium risk C rated	36 mths	3	1	1 + 1 Med	0	0	1	
Low risk D rated	48 mths	1	1	4	0	9	0	
Low risk E rated	60 mths	27+40 low	24	3 +1 Low	3 + 1 Low	138	18	
Unverified	This relates to errors within the database on set up	154	14	8	0	4	0	
New business	New business identified at 1 April o/s from 20/21)	30	9	20	8	88	33	
	Estimate based on new business identified during 20/21	13	8	2	2	16	12	
	Total (Estimate based on 2020/21 no. identified)	43	17	22	10	104	45	
Total		270	58	42	15	259	64	

#### **High risk businesses**

The number of high risk interventions due at the beginning 2021/22 was not identified in the Intervention Plan for that year, however a target of 100% was assigned through the SRS performance framework. During 2021/22 no high risk inspections were programmed for inspection.

#### **New business**

The estimated number of new businesses due an intervention at the beginning of 2021/22 was identified in the Intervention Plan for that year, and a target of 80% was assigned through the SRS performance framework.

	Bridgend			Cardiff			Vale of Glam		
	Estimat	Actual	%	Estimat	Actual	%	Estimat	Actual	%
	e due	comple	achieve	e due	comple	achieve	e due	comple	achieve
	21/22	ted	d	21/22	ted	d	21/22	ted	d
New business	43	17/45	37.77%	22	10/17	58.82%	104	45/80	56.25%

The Service failed to meet that target achieving 33.33% in Bridgend, 58.82% in Cardiff and 56.25% in the Vale of Glamorgan. The number of new feed businesses is relatively low however the number outstanding at the end of the year related to 138 premises.

#### **Re-visits**

The estimated number of re-visits due at the beginning of 2021/22 was not identified in the Intervention Plan for that year, as these are impossible to forecast. No re-visits however were undertaken during the year.

#### **Feed Safety Projects**

No feed projects were undertaken due to no funding being available and limited resources within the team to undertake additional proactive project work

#### **Prosecutions and enforcement action**

No prosecution or enforcements were undertaken during 2021/22.

## **6.1.4** Complaints

Based on the requests received during the previous year, it was estimated that the service would receive 635service requests during 2021/22, however the actual number was 756 (Bridgend 123, Cardiff 481 and Vale 152. The table below provides a breakdown of the estimated number and the number actually received and investigated in accordance with the Local Authority Enforment Monitoring (LAEMs) Report.

Complaint type	Brid	gend	Car	diff	Vale of Glamorgan		
	Estimate	Actual	Estimate	Actual	Estimate	Actual	
Food Hygiene	84	79	243	324	62	94	
Food Complaints	28	28	104	87	25	34	
Food Standards	14	15	50	68	24	24	
Feed Safety	0	1	1	2	0	0	
Total	126	123	398	481	111	152	

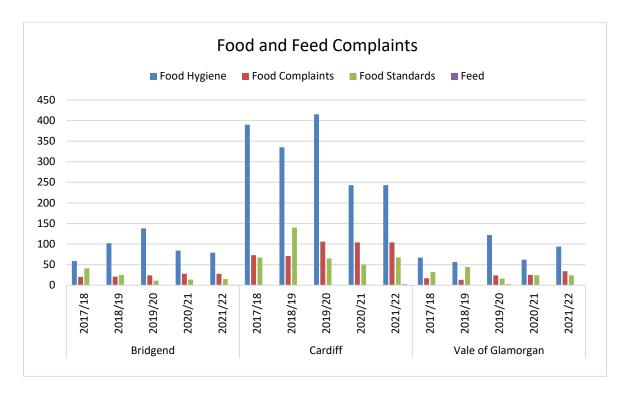
The table below shows the total number of food and food hygiene complaints received by the service during 2021/22 along with the timeliness of response in accordance with the set target date set. NB. The total figures below differ from those above due to the LAEMs report excluding premises not registered for food and are located outside the SRS area.

Complaints		Bridgend			Cardiff		Vale	of Glamo	rgan
	No.	Target	% inside	No.	Target	% inside	No.	Target	% inside
	received	days	target	received	days	target	received	days	target
Food Hygiene									
Food Practices	28	3	92.86%	41	3	75.61%	25	3	84%
Food Premises	48	1-3	85.42%	236	1-3	92.80%	56	1-3	83.93%
Water disconnections	25	1	76%	111	1	99.10%	16	1	100%
Accumulation of refuse	0	3	N/A	0	3	N/A	1	3	100%
Alleged food poisoning	2	1	100%	4	1	100%	7	1	71.43%
Salmonella Notification	2	1	100%	0	1	N/A	0	1	N/A
Referral from other LA	1	3	0%	4	3	75%	0	3	N/A
Food									
Food chemical	0	1	N/A	1	1	100%	1	1	0%
Food (foreign body)	23	3	86.96%	50	3	90%	24	3	100%
Food (microbiological)	5	1-3	80%	37	1-3	97.30%	7	1-3	85.71%

Food out of condition	3	3	100%	2	3	100%	5	3	100%
Food unsafe	0	3	N/A%	1	3	100%	1	3	100%
Total no. received	137			487			143		

The following graphs shows a breakdown of the complaints received over the last 5 years by type. It can be seen that Cardiff receives significantly more complaints than both Bridgend and the Vale of Glamorgan, more than double of the two areas. This is to be expected due to the large number of businesses in Cardiff.

The number of complaints received regarding Animal Feed is very low. Last year 3 complaints were received.



In addition to complaints, the service also receives a number of service requests that require a timely response and the table below shows the number of service requests received and the timeliness of response against the set target.

<b>Service Requests</b>		Bridgend			Cardiff		Vale	of Glamo	rgan
Service Requests	No. received	Target days	% inside target	No. received	Target days	% inside target	No. received	Target days	% inside target
Approval application	0	10	N/A	2	10	50%	1	10	0%
Covid 19 related	10	1	90%	12	1	50%	5	1	100%
Covid-19 Enquiry	1	5	100%	0	5	N/A	0	5	N/A
Export Certificates	0	3	N/A	0	3	N/A	2	3	100%
FHRS Appeal	2	21	100%	16	21	100%	4	21	100%
FHRS early publication	0	14	N/A	19	14	78.95%	2	14	100%
FHRS Non display	6	3	83.33%	17	3	82.35%	3	3	66.67%
FHRS Promo Regs	0	5	N/A	0	5	N/A	0	5	N/A
FHRS Re-score	4	5	75%	46	5	80.43%	6	5	100%
FHRS Right to reply	0	3	N/A	0	3	N/A	1	3	100%
FOI request	2	14	0%	19	14	5.26%	5	14	20%
Food Advisory visit	1	3	100%	5	3	80%	3	3	66.67%

Food Delivery Service	0	10	N/A	0	10	N/A	0	10	N/A
Food hygiene enquiry	196	5	86.73%	1087	5	88.04%	204	5	85.29%
Food registration	46	5	78.26%	92	5	79.35%	60	5	86.67%
FSA Food Alert	0	1	N/A	1	1	100%	0	1	N/A
FSA Information	0	5	N/A	2	5	100%	4	5	75%
Notification									
Planning consultation	2	10	100%	41	10	63.41%	0	10	N/A
Primary Authority	2	14	100%	2	14	100%	25	14	100%
Request for FHRS sticker	3	3	66.67%	18	3	77.78%	6	3	83.33%
Request from FSA	0	10	N/A	2	10	50%	0	10	N/A
Service complaint–Food	1	3	100%	1	3	0%	0	3	N/A
Total no. received	276			1382			331		

## 6.1.5 Home Authority Principle and Primary Authority

SRS now has some 32 Primary Authority partnerships in place with both local and national businesses and is able to charge for the work done as part of these arrangements on the basis of full cost recovery. Of those Partnerships, and despite the new regulatory scope approach within the changes to Primary Authority, 25 are more likely to request or be given advice and support from a Food or Feed perspective.

- BBI Healthcare
- Bravura Foods Ltd
- PJ & RP Best Ltd (t/a Brutons the Bakers)
- Cardiff and Vale University Healthboard
- Filco Supermarkets
- Just Perfect Catering
- Royal Voluntary Service
- Sloane Home Limited
- Vale Hotel & Resort
- Vydex Corporation
- Wild Water Group

#### Devolved Welsh Partnerships:

- Association of Convenience Stores
- Venture Life Healthcare Limited (formerly Bannatyne Group plc)
- Cadwaladers (Cardiff) Limited
- Craft Bakers Association
- Hallmark Care Homes
- HC-One Care Homes
- Health Food Manufacturers Association
- John Lewis
- Mitchells and Butlers
- One Stop Ltd
- Sainsbury's
- Tesco
- Waitrose
- Wine and Spirit Trade Association

#### 6.1.6 Advice to business

Shared Regulatory Services assists businesses by providing food and feed safety advice through a variety of channels, such as:-.

- Advice provided as part of the inspection process The service continues to provide food and feed safety advice as part of the inspection process, receiving the comments such as those below in relation to food safety inspections.
- Responding to complaints and requests for service See 6.1.4 above.
- Twice yearly food newsletter The Service's commitment to advising and supporting food businesses to achieve legal compliance and the highest possible standards continues with our twice yearly newsletter 'Food and Safety News', aimed at food businesses to inform, educate and advise on responsible food safety and health and safety across Bridgend, Cardiff and the Vale of Glamorgan. It should be noted however that the issue of the newsletter was suspended during in 2020 due to the Covid-19 pandemic.
- Provision of information leaflets The service provides guidance leaflets for new businesses
  that are starting out, home caterers, childminders, nurseries, event catering and also good
  practice hygiene guide for lower risk premises. There is also an event organisers guide to
  ensure that all food safety matters are considered during the planning of an event.
- Promotion and participation in national events, such as Food Safety Week SRS regularly
  issues press releases and food tweets in relation to campaigns such as promoting tips on
  safely preparing turkey at Christmas.
- Participation in working groups, such as Events Liaison Panel In order to ensure proper coordination with all partner agencies in preparation for the smooth running of major events,
  the Service is part of the Events Liaison Panel at Cardiff Council and the Events Safety Advisory
  Groups at both Bridgend and the Vale of Glamorgan. Having the capital city based within the
  SRS region and the coastline, there are lots of large events that are that attracted to the area
  such as the Elvis Festival held in Porthcawl, the Homeless World Cup, Mardi Gras and Winter
  Wonderland events in Cardiff and Vale Agricultural Show and Cowbridge Food and Drink
  Festival. These along with many others received advice, comments or visit support on food
  safety, health and safety, trading standards, pollution, licensing and specialist areas such as
  water usage.
- Advice through Shared Regulatory Services website A wide range of information is available
  on the SRS Website which is continually reviewed and updated.
- **Food Business Forums** Events such as the Food Safety Events held in 2017and 2019 hosted by SRS provide the opportunity to engage with food businesses and provide training on new legislation, topical issues or guidance to improve food safety compliance. Whilst no events took place in the last financial year, we value the opportunity to use these events to improve standards in food businesses and promote our tailored advice services.

- Practical targeted training –SRS provides accredited training to individuals through its Level 2 and 3 Food Safety and Level 2 Health and Safety Courses and HACCP and Allergens. SRS has further expanded the training being offered for businesses and now delivers training both face to face and online, to provide more choice and flexibility for food businesses.
- Paid for food hygiene advice visits available to all applicable food businesses Shared Regulatory Services offers a paid for advice service to businesses. A fee of £67 +VAT per hour is charged for an on site advice visit tailored to the businesses needs with a follow up written report. During 2021/22 no paid for advice visits were undertaken.

## 6.1.7 Food and Feed Sampling

The service receives an allocation from Public Health Wales for the microbiological analysis of food and water samples. Unfortunately last year, the service was unable to utilise the available budget due to the Covid-19 pandemic and the issues this presented.

The majority of informal food samples taken for surveillance and monitoring purposes are assessed using the criteria contained in the "Guidelines for Assessing the Microbiological Safety of Ready-to-Eat Foods Placed on the Market", revised HPA Guidance 2010 and Microbiological Criteria for Foodstuffs (EC Regulation 2073/2005). Most of these samples will be of an informal nature but the provisions of the Food Law Code of Practice will be followed when formal samples are required e.g. where a prosecution could result.

#### **Food Standards**

In relation to Food Standards, SRS carried out a number of surveys during 2021/22 which are highlighted in Section 6.1.2 of this Plan.

#### **Feed Safety**

No feed sampling programme was undertaken during 2021/22.

# 6.1.8 Control and investigation of outbreaks and food related infectious disease

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following section highlights the number of expected interventions due at the beginning of 2021 and the numbers carried out together with information on other activities. More detailed information can be found in the Communicable Disease and Health Protection Service Plan 2022/23.

Communicable Disease Intervention Plan 2021											
Туре	Number of Interventions estimated at start of year and the actual number carried out										
	Bridg	end	diff	Vale of G	lamorgan						
	Due based on estimate	Actual	Due based on estimate	Actual	Due based on estimate	Actual					
Total No. of food poisoning notifications	21	52	182	192	69	46					
No. of food related outbreaks	2	0	2	0	0	0					
Total	83	52	184	192	69	46					

In 2021, SRS was notified of 102,562 cases of communicable disease of which 102,272 were laboratory confirmed of which 0.4% (398) were confirmed food poisoning cases. Unconfirmed (suspected) food poisoning cases amounted to 0.3% (290).

The figures below illustrate the distribution of cases (confirmed and unconfirmed) across the 3 Local Authority areas.

	Notified CD Cases (¹CFP)	Unconfirmed CD Cases	Total CD Cases
Bridgend	21427 (102)	52	21479
Cardiff	58603 (223)	192	58795
Vale	22242 (73)	46	22288
TOTAL	102272 (398)	290	102562

<sup>1</sup>CFP – confirmed food poisoning as applied in the 'Disease' tab in Tarian

As the number of communicable disease cases increased substantially between 2020 and 2022 due to Covid-19, we saw a decline in the number of food poisoning cases, both confirmed and suspected cases compared to previous years which was observed across all 3 authorities. The nature of these cases usually involves a complainant visiting a commercial food business and subsequently alleging that business has caused them illness. The decline in numbers can almost certainly be attributed to the COVID-19 pandemic and 'lockdown' periods initiated in March, October and December 2020, during which commercial food businesses either closed completely or were only able to offer a takeaway service.

The incidence of Campylobacter infection throughout SRS far exceeds other notifiable diseases, which reflects the national trend observed across the UK. The reason for such high numbers of cases is the wide range of risk factors associated with Campylobacter. Campylobacter remains an important public health risk. The pathogen has multiple risk factors in addition to having a low infective dose, meaning that a person only needs to be exposed to a small amount of the bacteria to become ill. It is therefore critical that the communicable disease service retains the requisite level of resource to be able to effectively investigate all confirmed cases in a timely manner.

Laboratory Confirmed Cases of Campylobacter 2011 - 2021 Number of cases ■ Bridgend Cardiff ■ The Vale of Glamorgan

<u>Graph: Reported cases of Campylobacter from 2010 – 2021</u>

Last year saw the highest number of Campylobacter cases being reported to SRS since the 3 local authorities merged into a shared service in 2015. As a whole, SRS received 980 confirmed cases of Campylobacter in 2021 compared with 759 in 2020; 954 in 2019; 863 in 2018; 741 in 2017 and 722 in 2016. This resumes the upward trend that was observed before the start of the COVID-19 pandemic, which was anticipated because of the following factors:

- More symptomatic cases were able to present to their GP in person and submit faecal samples in 2021;
- Relaxed restrictions on national and international travel significantly increased the movement of households and communities;
- More people eating at commercial food premises as COVID-19 restrictions relaxed;
- Public perception that hand hygiene was less important after receiving COVID-19 vaccination removed the protection in place for other communicable diseases.

This general, year-on-year, increase is not unique to the UK. Some studies have linked weather and climate factors (particularly increases in temperature and precipitation) to an increased prevalence of Campylobacter cases. Other suggested casual factors have included levels of infection in poultry; changing populations; changing exposure patterns and microbial features such as antimicrobial resistance (K. Khun et al., 2020).

Pathogens of public health significance (other than Campylobacter) commonly require more detailed investigation; either because the pathogen can be readily spread within the community, or because of the seriousness of the infection. The need to complete enhanced interview questionnaires to identify close contacts of a case, and/or potentially instigate wider public health interventions, is particularly true for pathogens such as: Shigella; Hepatitis A and E; E.coli O157; Legionella and Giardia. This will usually require an Officer to interview the case face-to-face, instead of by telephone, and will often necessitate arranging faecal pots from close contacts to identify if the infection has spread in a particular setting.

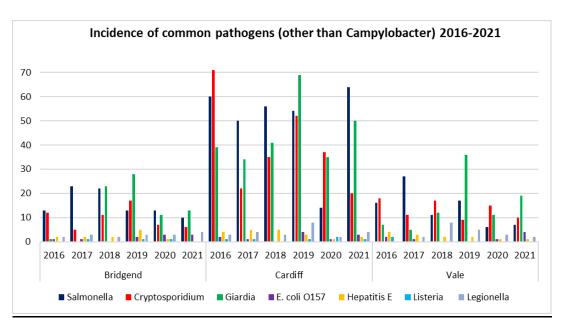
e.g. Vaccination of close contacts to Hepatitis A cases; Ensuring confirmed cases of Giardiasis receive appropriate antibiotic treatment from their GP; Ensuring that cases working with food or vulnerable people only return to work after the satisfying the relevant microbiological clearance requirement;

Formally excluding cases working with food or vulnerable people from work until microbiological clearance has been confirmed.

Contrary to the general public perception, most communicable diseases are not necessarily caused from consuming contaminated food; despite the case having traditional 'food poisoning' symptoms. Risk factors are often associated with the consumption of (or exposure to) contaminated water; direct contact with animals and/or their faeces; close contact with an infected person (including sexual contact).

The graph below illustrates the incidence of common pathogens (other than Campylobacter) that have caused illness across SRS between 2016 and 2021.

<u>Graph: Incidence of the common pathogens causing food poisoning in SRS between 2016 – 2021</u>



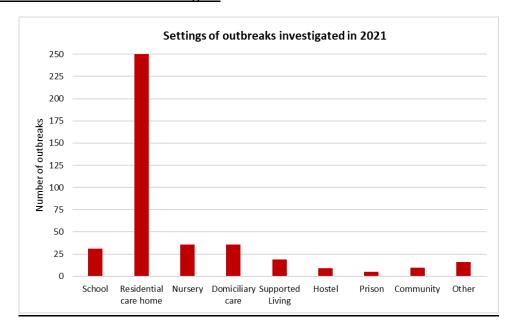
Compared to previous years, SRS observed a decrease in the number of reported Salmonella cases in Bridgend and Vale of Glamorgan during 2021. Cardiff, however, experienced an increase in confirmed cases during 2021 which was largely attributed to an outbreak of Salmonella typhimurium following an Eid celebration gathering within the Sudanese community.

A decline in reported cases of confirmed Cryptosporidium was also seen in 2021, but that may be an artefact of the COVID-19 pandemic (e.g. swimming pools not used as frequently; hygiene measures in place; decrease in visitor numbers to animal handling establishments), or positive outcome of Officer visits to open farm/animal handling and petting establishments between June and September 2021 to ensure the robust implementation of adequate hygiene and infection control measures.

#### **Outbreaks**

In addition to the investigation of sporadic cases of food poisoning in 2020, a total of 413 outbreaks were investigated by the Communicable Disease Service, compared with 527 in 2020 and 85 in 2019. Unexpectedly 91% of outbreaks identified and investigated were due to COVID-19.

Graph: Outbreaks in 2021 across the region



Unsurprisingly the largest number of outbreaks were seen in residential care home settings (251, 61%), followed by early years settings (nurseries) and domiciliary care agencies; both with 36 (9%). COVID-19 accounted for 91% (374) of all outbreaks. Suspected Norovirus accounted for 7% (29) of all outbreaks and confirmed Norovirus was responsible for 1.2% of all outbreaks (5). The remaining 5 outbreaks were confirmed as Salmonella, Legionella and E.coli O157.

In total there were 4 food related outbreaks during 2021, 2 in Bridgend and 2 in Cardiff. One was a group of people who had eaten at a food festival in the Bridgend area and had unconfirmed illness with diarrhoea and vomiting symptoms and the other Bridgend outbreak related to an E.coli 0157. This incident concerned a 1 year old child who had attended nursery during his infectious period. The likely source of infection was the domestic setting; a small holding with a private water supply, dogs, cows and sheep. Sampling of the private supply returned positive results for presumptive E. coli which enabled the Officer to provide infection control advice for both the short and long-term. In Cardiff, there were 2 outbreaks, one Salmonella outbreak linked to an EID celebration BBQ and a Norovirus outbreak linked to 2 events at a City Centre hotel.

In these situations Officers provide considerable support to the business duty holder, or legacy Authority for Council operated establishments, to ensure that enhanced cleaning arrangements are instigated at the earliest opportunity and maintained for the required duration. Officers also provide advice on the implementation of appropriate exclusion arrangements to ensure that the spread of infection is contained at the earliest opportunity, and disruption to business is minimised. Further information on the control and investigation of outbreaks and food related infectious disease can be found in the Communicable Disease and Health Protection Plan 2022/23.

Further details of projects and health promotion work can be found in the Communicable Disease and Health Promotion Plan 2022/23.

## 6.1.9 Feed/Food Safety Incidents

There was one Food Alert for Action received from the Food Standards Agency for Cardiff. This alert related to the detection of salmonella in chillie powder.

There was one Feed Alert during the year, which related to salmonella detected in reptile feeder rodents.

## 6.1.10 Liaison with other organisations

Liaison with other organisations remains a constant theme of the work of SRS. The list at 3.8 represents all those organisations that the service liaised with during 2022/23.

## 6.1.11 Food and Feed Safety Promotion

Promoting a positive food safety culture is undertaken through a variety of channels, many of which are directly linked to providing advice to business. See 6.1.6 above.

## 6.2 Identification of any variation from the Service Plan

The mechanisms in place to review performance enable remedial action to be put in place should any shortfalls against targets or plans occur during the year. Consideration will be given to the various factors that may contribute to any shortfalls and whether additional resources, re-allocation of staff resources or re-prioritisation of workload is required to resolve any problems. Any issues that may not have been resolved at the end of the year will be included in the Service Plan for the following year.

Performance against the Food and Feed Law Service Plan 2021/22 has been outlined in detail above. It was recognised at the time of plan adoption that there would be difficulties in delivering the full requirements of the Food Law Code of Practice. This was due to insufficient resources and the Covid-19 pandemic which caused the re-purposing of staff to Test, Trace and Protect. In July 2021, the Food Standards Agency finalised a Recovery Plan to assist local authorities with the known backlogs created as a result of the pandemic, and the service re-prioritised resources to focus on the higher risk businesses in accordance with the plan.

There is a known national shortage of Environmental Health Officers which impacts the recruitment process, extending the time taken to recruit suitable candidates and provide the necessary training to undertake the role. This had a dramatic impact on performance compared to the previous year's achievement. The Service is continuing with a recruitment exercise to fill these vacant posts and has recruited a number of students to assist with the work of the service. Furthermore, we are also engaging with contractors in order to complete the backlog of inspections as a result of these circumstances.

In accordance with the requirements of the food law code of practice, E rated premises inspections are able to be completed utilising self assessment questionnaires. This is due to the low risk nature

of such premises, examples of which include clothing stores selling confectionary goods such as sweets and chocolates. The purpose of the questionnaire is to determine whether the said low risk food items have further developed and ensure the business would not require re- categorising based on it's practices.

The shortfall of inspections carried out last financial year will impact the required programme for the forthcoming year.

The inspection for the purpose of food hygiene matters will be done as a matter of course with the food standards inspection being added to further enhance the inspection. Any further enforcement matters required for the purpose of food standards matters will be referred to the Trading Standards team for action.

## 6.3 Areas for improvement

As part of the annual review process, any areas for improvement will be identified and included in the Plan and/or the Service Area Business Plan with such improvement encompassing areas such as :-

- Improvements to working practices;
- New projects or initiatives;
- Greater partnership working;
- Improvements in efficiency and effectiveness;
- Promotion of food issues;
- Greater focus on outcomes.

As a result of a review of the service, the following opportunities for development are identified for 2022/23.

#### **Food Safety**

- Prioritise inspections in accordance with the Food Standards Agency Recovery Plan.
- Continue to implement and enforce the statutory Food Hygiene Rating System at all visits carried out by the Food and Port Health Teams and initiate projects to ensure appropriate display of ratings.
- Review and revise the SRS authorisation procedure to fully reflect the new competency requirements as prescribed by the food standards agency.
- Continue engaging with business and communicating food safety messages.
- Promote the uptake of paid for advice and training by businesses to improve their hygiene ratings.
- Engage with local businesses to promote and secure additional Primary Authority relationships.
- Develop a recruitment and retention policy to attempt to address current recruitment pressures and further explore more innovative ways of maintaining a competent food safety workforce.

#### **Food Standards**

- Prioritise inspections in accordance with the Food Standards Agency Recovery Plan.
- Ensure all unverified premises are contacted and risk assessed as appropriate.
- Prioritise the development of Food Hygiene officers in undertaking food standards inspections in accordance with new working arrangements.
- Ensure database is up to date and accurate.

#### **Feed Hygiene**

- Ensure all unverified premises are contacted and risk assessed as appropriate.
- Prioritise newly registered feed businesses for inspection.
- Increase the number of qualified and/or competent feed officers through training and monitoring to ensure resilience within the Service.

## **Appendices**

- A. Food Safety Sampling Plan
- B. Food Standards Sampling Plan
- C. National Feed Enforcement Priorities 2022/23
- D. Corporate Priorities of partner authorities
- E. SRS vision, priorities and outcomes

# **Appendix A - Food Safety Sampling Plan 2022/23**

	Food Safety Sampling Plan 2021/22										
Survey	Survey no. if applicable	Timeframe including days	Target Number of premises in total	Number, to be submitted at one time	Analysis required	Team					
Welsh Food Microbiological Forum Shopping Basket 15a		July- March Mondays & Tuesdays	60 Cardiff, 30 Vale and 30 Bridgend	Approx 10 per day	Aerobic Colony Counts, Enterobacteriaceae, E. coli, Staph aureu, Bacillus cereus and species. Listeria monocytogenes and species (direct), Listeria monocytogenes and species (enrichment), Salmonella species (enrichment)	Commercial					
Port Health Waters Shoreside and airside		Sept to March	13 locations	Approx 5	E. coli, Enterococci, Coliforms, Aerobic Colony Count	Commercial					

### **Appendix B - Food Standards Sampling Plan 2022-23**

Q	Food Matrix	Analysis	Target Number	Cost per sample (excl vat)	Total Cost (excl vat)
1	Falsely described Vegetarian dishes and undeclared allergens at catering establishments (Take-away)	Vegetarian/ Allergen: to detect the presence of an allergenic ingredient (crustaceans and fish) where sample was requested to be free from that ingredient due to an allergy and description of food a suitable for vegetarians.	10 (GG)	Crustaceans - £102 fish - £102	£1020
2	Locally made "craft" gin, vodka and Ale to assess accuracy of declared alcoholic strength	Accuracy of declared alcoholic strength	10 (GG)	£191	£1910
3	FSA Funded project TBC	To be confirmed.	10		
4	"Doner" Kebabs	Allergens – analysis to determine presence of milk  Speciation – analysis to determine the presence of species other than lamb	10 (GG)	£96 £290	£960 £2900
All year	Retail Butcher Survey	Mince described as 'Lean' – fat and collagen analysis to determine compliance with compositional standards	''	£96	£1440

Q	Food Matrix	Analysis	Target Number	Cost per sample (excl vat)	Total Cost (excl vat)
		Burgers/sausages made on site – meat content and level of SO2  Meat content only  Sulphur Dioxide only  Natasha's Law – checks in relation to labels on products that are pre-packed for direct sale to ensue that they meet the labelling requirements to provide including emphasising allergens within the ingredients list.	Approx.15 Approx.15 Approx.15	£152 £64 £70	£2280 £960 £1050
Total cost sampling					£13,540

# **Appendix C – National Feed Enforcement Priorities 2022/23**



# National Enforcement Priorities for England and Wales

Feed law enforcement and food hygiene law enforcement at primary production

**March 2022** 

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#### Summary

This publication aims to guide local authority (LA) enforcement officers in England and Wales in the prioritisation of the delivery of official controls for:

- feed (at all stages of production, processing, storage, transportation and distribution including import/export and the primary production of feed) and
- food hygiene at primary production.

#### Legal status

The National Enforcement Priorities (NEPs) should be considered alongside the <u>Feed Law Code of Practice and Food Law Code of Practice and respective practice guidance</u>. Links to legislation and guidance to support LAs to embed these priorities within their annual plan of official feed and food controls can be found within this document.

The following priorities are intended to support LAs to focus their official controls conducted at the frequency set out in the Feed and Food Law Codes of Practice.

#### Who is this publication for?

This document is primarily intended for LA enforcement officers. However, it will also be of interest to all feed business operators and those food business operators at the level of primary production and the FSA approved industry assurance schemes and private sector assurance bodies. Please note that some links in the document are only available to LA enforcement officers.

#### Review date

This document will be reviewed before March 2023.

#### Main points

This document sets out the Food Standards Agency's (FSA's):

- National Enforcement Priorities for England and Wales, in respect of animal feed at all levels of production and/or supply and food hygiene at the level of primary production
- expectations of LAs to implement, where relevant, these priorities in the course of delivering their intervention programme

#### Introduction

The objectives of the priorities are to:

- drive an intelligence led approach to official controls, focusing resources on higherrisk and non-compliant businesses, placing an increased focus on outcomes
- maintain a level playing field for compliant food and feed businesses, which is in the interests of industry as a whole and supports trade in feed and food
- reduce unnecessary burdens by focusing LA activity on agreed areas
  of greatest threat to public and animal health
- drive up the quality and consistency of official controls
- realise our commitment to ensuring food is safe and what it says it is

#### The priorities:

- have been informed by the 2021 review of the UK Animal Feed Threat Assessment 2019 (AFTA 2019)
- have been developed in consultation with feed industry and LA representatives;
   National Trading Standards (<u>NTS</u>); the National Agriculture Panel (NAP) and
   National Animal Feed at Ports Panel (NAFPP) members
- support our mission to safeguard public and animal health by driving up sustained improvements in compliance, through intelligence led enforcement
- support the intelligence led approach outlined in the <u>Food Law Code of Practice</u> for the prioritisation of interventions in food businesses operating at the level of primary production

The gathering and exchange of information, data and intelligence between competent authorities, central government departments and industry, including FSA approved assurance schemes, is a key element to an effective risk-based system of official feed and food controls.

LAs are expected to ensure effective information sharing, communication and exchange of intelligence in accordance with the Feed and Food Law Codes of Practice and Practice Guidance. The proactive use of recognised trading standards national intelligence databases (such as <a href="IDB">IDB</a> and Memex) is considered key for the recording and sharing of intelligence. LAs should share all intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases, with the <a href="National Food">National Food</a> Crime Unit (NFCU).

#### National Priorities 2022/23

The priorities are not listed in any particular order; the numbering is for reference only.

#### **Animal Feed Priorities**

- **Priority 1:** Verification of effective implementation and maintenance of feed safety management systems
- **Priority 2:** Verification of effective implementation and maintenance of feed safety management systems at businesses supplying former foodstuffs or coproducts
- **Priority 3:** Effective monitoring of feed on farms
- a: Examination of former foodstuffs / co-products being used for feed on farms
- **b**: On-farm record keeping requirements & documented procedures **Priority 4**:

Effective monitoring of storage arrangements at feed premises **Priority 5:** Verification of the accuracy of feed labelling

**Priority 6:** Effective monitoring of consignments of feed originating from non- EU countries, at points of entry

#### Food Hygiene at Primary Production Priorities

**Priority 7:** Effective identification, registration and inspection of food businesses producing higher-risk, fresh produce operating at the level of primary production

Further information on each priority is provided in the sections below.

#### **Animal Feed Priorities**

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

LAs are expected to give priority to verifying feed safety management systems including permanent written procedures based on Hazard Analysis and Critical Control Point (HACCP) principles. This includes ensuring Feed Business Operators (FeBOs) understand legal requirements, are implementing, maintaining and reviewing, as appropriate, their feed safety management systems and HACCP plans, having regard to the nature, size and scale of the business. Where a business has a primary authority relationship, verification of compliance must take account of any primary authority assured advice issued and any active inspection plan.

#### This should include a focus on the following:

- a) identification of hazards, ensuring all steps in the process have been considered and any grouping of steps (e.g. consideration of individual ingredients) is appropriate and not done in such a way that hazards are overlooked or riskassessed incorrectly
- b) where a hazard is not adequately controlled by a prerequisite procedure, Critical Control Points (CCPs) are correctly identified, properly defined and effectively controlled in a timely manner. (NB. In relation to raw pet food CCPs should include safe sourcing)
- c) establishing that appropriate systems are in place to minimise cross-contamination between batches of feed, particularly in respect of those containing coccidiostats, veterinary medicines or feed <u>additives</u> with maximum permitted levels for any target species
- d) appropriate sampling programmes at the feed business are in place to verify compliance with maximum levels of undesirable substances in feed materials and feed additives. Checks should include an examination of analytical results and consideration of whether appropriate action has been taken

- e) scrutinising traceability systems to ensure that product
  - i) can effectively be traced in the event of a product recall or withdrawal
  - ii) not intended for feed use is not diverted into the feed/food chain

# Priority 2: Verification of effective implementation and maintenance of feed safety management systems at businesses supplying former foodstuffs or coproducts

Every year in the UK, around <u>650,000 tonnes of former foodstuffs are processed as animal feed, worth £110 million</u>. Where former foodstuffs intended for use in feed are delivered with packaging, it must undergo further treatment to remove the packaging before being used as feed. This process is often carried out at a specialist former foodstuffs processing premises.

NTS have produced <u>toolkits</u> to support LA officers in relation to businesses supplying former foodstuffs and co-products.

LAs are expected to give priority to the verification of effective feed safety management systems including permanent written procedures based on HACCP principles at businesses supplying former foodstuffs or co-products. Where a business has a <u>primary authority</u> relationship, verification of compliance must take account of any primary authority assured advice issued and any active inspection plan.

In addition to the points covered by Priority 1, this should include a focus on the following:

- a) the identification of control points to ensure that material is suitable for use as animal feed, for example feed for farmed animals does not include items such as meat, fish and shellfish (including products containing them or that have been in contact with them)
- b) appropriate segregation of material not intended for use as feed
- c) the existence of an appropriate recorded training programme for staff in charge of dealing with former foodstuffs

- d) material is only supplied to a registered feed business
- e) suppliers and hauliers in the chain of processing former foodstuffs to feed and coproducts are all registered as feed businesses

#### **Priority 3: Effective monitoring of feed on farms**

## 3a: Examination of former foodstuffs / co-products being used for feed on farms

LAs are expected to examine, where applicable that any former foodstuff or co-product being used for feed on farms:

- a) is not contaminated
- b) does not contain prohibited substances as listed in Annex III of <u>Retained EU</u>

  <u>Regulation 767/2009</u> on the placing on the market and use of feed
- c) is being sourced from a registered feed business establishment

#### 3b: On-farm record keeping requirements & documented procedures

Compliance with the record keeping requirements detailed in Annexes I and II of <a href="Retained EU Regulation 183/2005">Retained EU Regulation 183/2005</a> laying down requirements for feed hygiene, should be examined on farms, including:

#### Annex I

- a) any use of plant protection products and biocides;
- b) use of genetically modified seeds;
- c) any occurrence of pests or diseases that may affect the safety of primary products;
- d) the results of any analyses carried out on samples taken from primary products or other samples taken for diagnostic purposes that have importance for feed safety;
- e) the source and quantity of each input of feed and the destination and quantity for each output of feed.

and, in addition, for farms subject to the requirements of Annex II (R10):

a) traceability records in relation to purchased feeds, with a particular focus on feed additives and/or premixtures

b) documented procedures based on the principles of HACCP

#### Priority 4: Effective monitoring of storage arrangements at feed premises

At all stages of the feed chain suitable storage and product identification is necessary to prevent the introduction of hazards to feed.

LAs are expected to give priority to:

- a) ensure separation of feed materials and additives from finished feed
- b) feed kept separate from any non feed materials such as plant protection products, cleaning chemicals and waste etc. that could contaminate the feed
- c) that facilities are secure from external hazards e.g. rain, sewage and other sources of contamination
- d) the suitablility and cleanliness of containers for feed, where used
- e) ensure feed in storage is readily identifiable

#### Priority 5: Verification of the accuracy of feed labelling

Information on feed labels is essential to enable FeBOs, throughout the feed chain, to make appropriate use of material used in the manufacture of feed or for direct feeding and for traceability in the event of a product recall or withdrawal.

LAs are expected to give priority to:

- a) verifying additives present in feed are authorised (included in the register of feed additive authorisations for Great Britain) in line with Retained EU Regulation
   1831/2003 on additives for use in animal nutrition
- b) verifying the accuracy of claims as set out in Article 13 of <u>Retained EU Regulation</u> 767/2009 on the placing on the market and use of feed
- ensuring the traceability information is sufficient and accurate to identify the supplier of the feed and enable confirmation that the feed supplied matches the description purchased

### Priority 6: Effective monitoring of consignments of feed originating from non-EU countries, at points of entry

Imported feed makes up a significant proportion of feed used in the UK. To support a consistent and risk-based approach to monitoring imports LAs are expected to give priority to monitoring irregular consignments of feed originating from non-EU countries (including feed that has transited through the EU), in consideration of:

- a) NTS guidance on consistency and prioritisation of the delivery of official controls at points of entry
- b) sampling consignments which have not been sampled recently or have not been seen before at the point of entry or where there is reason to believe they might fail to comply with legal requirements
- c) the Risk Likelihood Dashboard for (England) and (Wales)

#### **Food Hygiene Primary Production Priorities**

# Priority 7: Effective identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production

LAs are expected to give priority to the identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production. Some examples are given to illustrate each category, however these are not intended to be an exhaustive list and LAs are advised to use their professional judgement.

#### These are:

- a) producers of soft fruits and berries, for example raspberries, blackberries,
   mulberries, loganberries and strawberries, for which a thorough wash post-harvest
   will be difficult to achieve without damaging the produce
- b) producers of leafy greens and salad fruit and vegetables
  - i) normally eaten raw, for example lettuce, micro leaves, baby leaves, watercress, spinach, herbs and cucumbers
  - ii) that have a short seed to harvest time meaning that they are likely to be harvested within 2 weeks of last irrigation. If irrigation water is contaminated, this contamination will not have had time to dissipate in short harvest crops
- c) producers of bulb and root vegetables, or vegetables with no protective skin, that are commonly consumed raw, for example salad onions, radishes and celery

#### Guidance

#### **Animal Feed**

#### Food Standards Agency (FSA)

**Animal feed legislation** 

Removal of food grade packaging material in surplus food into the feed chain

Guidance on HACCP-related requirements for farmers

#### **National Trading Standards (NTS)**

Co-producers and suppliers of surplus food

#### **Advisory Committee on Animal Feedingstuffs (ACAF)**

Review of on-farm feeding practices - updated recommendations on identifying hazards and minimising risks

#### **Animal and Plant Health Agency (APHA)**

How food businesses must dispose of food and former foodstuffs

#### Department for Environment, Food & Rural Affairs (Defra)

<u>Code of Practice for the Control of Salmonella</u> during the Production, Storage and Transport of Compound Feeds, Premixtures, Feed Materials and Feed Additives

#### **British Standards Institution (BSI)**

<u>Prerequisite programmes for food safety in the manufacture of food and feed for animals</u>

Food and Agriculture Organization of the United Nations (FAO) and International Feed Industry Federation (IFIF)

Good Practices for the Feed Sector implementing the Codex Alimentarius

Standards Code of Practice on good animal feeding

#### **European Commission**

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<u>Guides to Good Practice</u> developed in accordance with Article 22 of Retained EU <u>Regulation 183/2005</u> laying down requirements for feed hygiene

- Community guide to good practice for the EU industrial compound feed and premixtures manufacturing sector for food-producing animals (The European Feed Manufacturers' Federation - FEFAC)
- Community guide to good practice for feed additive and premixture operators
   (The Quality and Safety Sytem for Speciality Feed Ingredients -FAMI-QS)
- Guide to good practice for the manufacture of safe pet foods (The European Pet Food Industry - FEDIAF)
- European Guide to good practice for the industrial manufacture of safe
   feed materials
  - The manufacturing of safe feed materials from starch processing
  - The manufacturing of safe feed materials from oilseed crushing and vegetable oil refining
  - The manufacturing of safe feed materials from biodiesel processing
  - Salmonella <u>auditor checklist</u> and <u>factsheet</u>
- European Guide to Good Hygiene Practices for the collection, storage,
   trading and transport of cereals, oilseeds, protein crops, other plant products
   and products derived thereof

Guides to Good Practice developed in accordance with Article 26 of Retained EU Regulation 767/2009 on the placing on the market and use of feed

- <u>EU Code of good labelling practice for compound feed for food producing</u> animals (FEFAC)
- Code of Good Labelling Practice for Pet Food (FEDIAF)

#### **Industry Standards**

#### **Agricultural Industries Confederation (AIC)**

Feed Material Assurance Scheme Standards (FEMAS)

<u>Trade Assurance Scheme for Combinable Crops</u> (TASCC)

<u>Universal Feed Assurance Scheme</u> (UFAS)

BRC Voluntary Module 9 – Management of Food Materials for Animal Feed

**Red Tractor** 

**Assured Food Standards** 

**Farm Assured Welsh Livestock** 

Welsh Lamb and Beef Producers Ltd

Imported Feed

#### Food Standards Agency (FSA)

Effective Import Controls for food and feed not of animal origin at smaller seaports and airports

**Association of Chief Trading Standards Officers (ACTSO)** 

Sharing information and intelligence to support delivery of imported feed controls

**Animal and Plant Health Agency (APHA)** 

UK border control posts: animal and animal product imports

Food Hygiene Primary Production

Food Standards Agency (FSA)

Primary production food hygiene inspection guidance

Links to information sources that may assist the identification of primary producers in your area

Defra – Structure of the agriculture industry in England and the UK at June

Defra – Agriculture in the UK

Environment Agency – map of water abstraction licenses

Agriculture and horticulture development board (AHDB)

British growers association

Pick your own farms

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download https://www.food.gov.uk/business-guidance/national-enforcementpriorities- for-animal-feed-and-food-hygiene

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# **Appendix D – Corporate Priorities and outcomes of partner local authorities**

Bridgend County Borough Council

#### **Priorities**

#### Outcomes/Aims

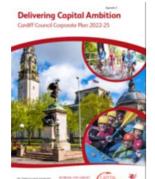


- Supporting a successful sustainable economy
- Helping people and communities to be more healthy and resilient
- Smarter use of resources
- Support local people develop skills and take advantage of opportunities to succeed.
- · Create conditions for growth and enterprise
- Create town centre and communities that improve the quality of life for citizens
- Give people more choice and control over what support they receive ...
- Reduce demand through more targeted early help and intervention programmes
- Develop more active, healthy and resilient communities...
- Ensure the Council is financially sustainable over the longer term.
- Improve efficiency and access to services...
- Work collaboratively to make the most of natural and physical assets
- Develop the culture and skills required to meet the needs of a changing organisation

#### City of Cardiff Council

#### **Priorities**

#### Outcomes/Aims



- Cardiff is a great place to grow up
- Cardiff is a great place to grow older
- · Supporting people out of poverty
- Safe, confident and empowered communities
- A Capital City that works for Wales
- Cardiff grows in a resilient way
- Modernising and integrating our public services

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- Safe, confident and empowered communities
- A Capital City that works for Wales
- Cardiff grows in a resilient way
- Modernising and integrating our public services

#### Vale of Glamorgan Council

#### **Priorities**

#### Outcomes/Aims



- To work with and for our communities
- To support learning, employment and sustainable economic growth
- To support people at home and in their community
- To respect, enhance and enjoy our environment

#### A Vale that is:

- Inclusive and Safe
- Environmentally Responsible and Prosperous
- Aspirational and Culturally Vibrant
- Active and Healthy

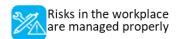
### **Appendix E**

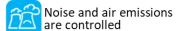
### SRS vision, priorities and outcomes

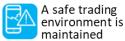
To be the leading provider of regulatory services that safeguard the health, safety and economic wellbeing of the region

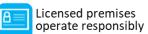




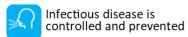








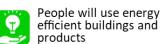


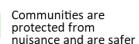


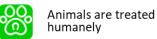


#### Protecting the environment











Taxi provision is safe and

Illegal money lending

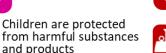
activities are prevented

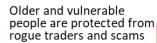


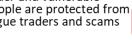
Vulnerable people are not subject to exploitation, slavery or trafficking



Safeguarding the vulnerable







Informed and confident consumers

A fair trading

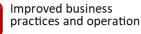
maintained

environment is



Supporting the

local economy









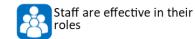
SRS operates effectively and efficiently across all



Public and stakeholders can access our services



Income generation underpins sustainable service delivery





#### **Delivering our priorities**

Understanding the needs of our customers and placing their needs at the heart of the services we deliver;

Developing a flexible and agile workforce that is responsive to change and that have the right skills to deliver quality services that meet the needs of our customers and local communities;

Maximising internal efficiencies to enhance service quality;

Exploring opportunities to innovate and develop;

Working together to future proof the service to meet financial challenges and future demands.