

Shared Regulatory Services

Food and Feed Law

Service Plan 2021/22



Food Hygiene
and Standards



Shared
Regulatory
Services

Cyngor Bwrdeistref Sirol



VALE of GLAMORGAN



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Introduction

Shared Regulatory Services (SRS) is a collaborative service formed between Bridgend, Cardiff and the Vale of Glamorgan Councils on 1st May 2015. The Service 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 year 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 :-

Improving health and wellbeing

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 600,000 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 360,000. 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



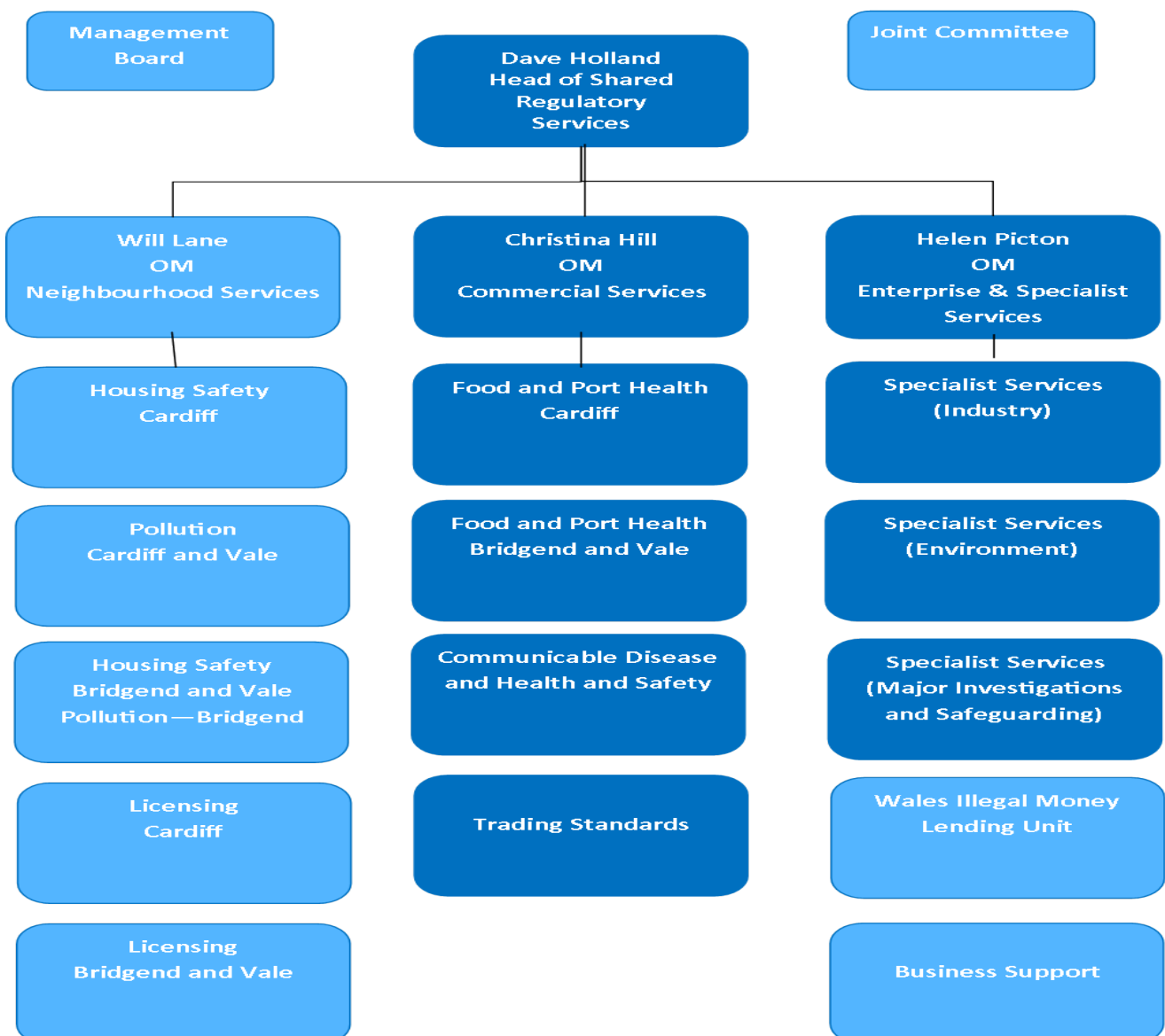
130,000 residents. The area is predominantly rural in character, but contains several urban areas of note such as Barry, Penarth, Dinas Powys and the historic towns of Cowbridge and Llantwit Major. Barry is the largest town, a key employment area and popular seaside resort. The rural parts of the Vale 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

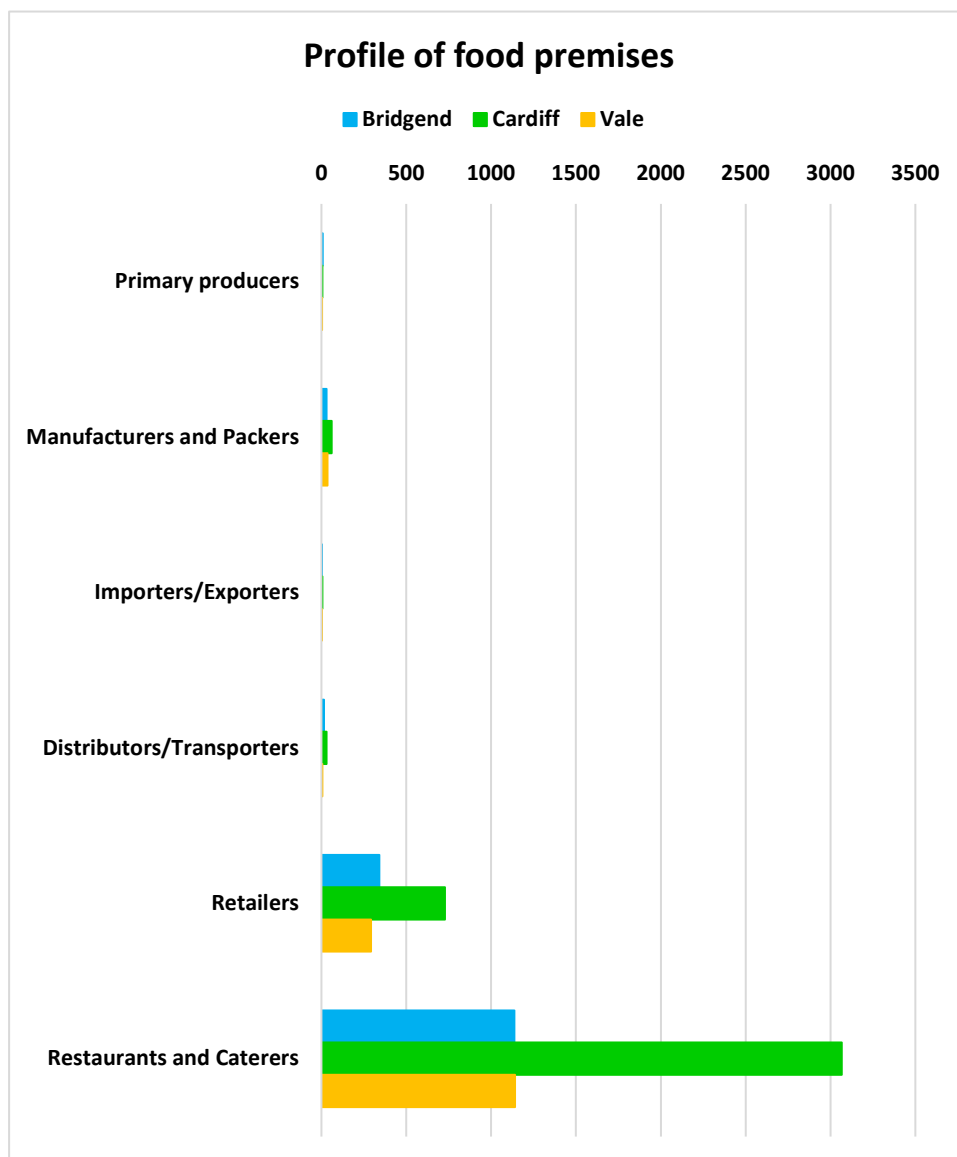
Responsibility for food safety activities is broken down as follows:-

Team	Responsibility
Food and Port Health Teams (Commercial Services)	Food Safety Intervention programme in retail and catering businesses
	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 (Commercial Services)	Feed safety and standards at commercial premises
	Food Standards inspection programme in retail premises
	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 (Commercial Services)	Communicable disease
Specialist Services (Enterprise and Specialist Services (Industry))	Food Safety and Standards Intervention programme at manufacturing and 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
	Specialist Services (Enterprise and Specialist (Environment))
Complaints and requests for service	
Feed Sampling	
Inspection	
Feed safety alerts and incidents	
Specialist Services (Major investigations)	Investigation of any large scale investigation involving food or feed

2.4 Demands on the Food and Feed Service

2.4.1 Food Safety

The region has approximately 6906 food premises with Bridgend having approximately 1532 premises, Cardiff approximately 3895 premises and the Vale of Glamorgan 1479. 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 6906 identified food businesses 18 are approved (4 Bridgend, 11 Cardiff and 3 Vale).

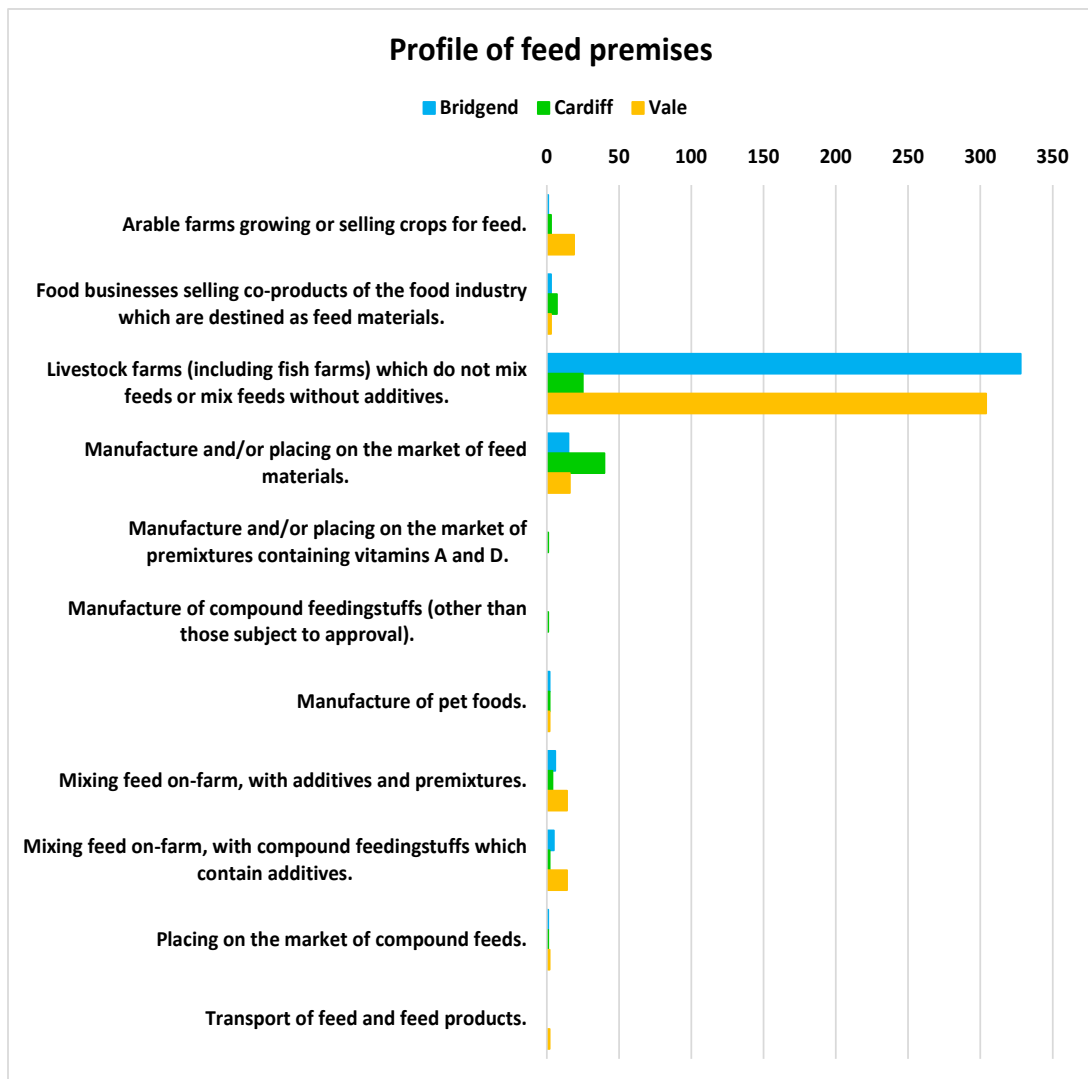


2.4.2 Feed Safety

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 re-entering 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 re-issued in October 2014 requires that inspection of animal feed premises are in line with a risk based approach. There are currently 824 registered feed premises, 361 in Bridgend, 87 Cardiff and 376 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 88 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

Tel: 0300 1236696



@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 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 inability to inspect these premises has inevitably led to a backlog of programmed inspections, particularly in relation to 'C' rated and new business inspections where a backlog already existed pre-pandemic. This work will continue into 2021-22 as the virus SRS continues to impact our daily lives requiring 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 issues facing food teams, the Food Standards Agency have 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 2021/22 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.

New Food Businesses – New food businesses are required to register with the service. A registration is required 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 coupled with the prosperity and increasing popularity of the City of Cardiff means that the number of new food businesses attracted to the City is constantly increasing. This places a significant impact on the resources of the Food Safety and Trading Standards functions due to the large number of applications received and is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention. During 2020/21 1031 applications were received, 597 in Cardiff, 211 in Bridgend and a further 223 in the Vale of Glamorgan all of which are required to be inspected alongside the planned programme of inspections. A larger number of new home catering food businesses were noted to be opened last year possibly due to the change in viability of normal businesses and to meet the public demand to introduce some variety to their lifestyle during “lockdown”.

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 import of products of animal origin. 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, but it is anticipated that trade patterns may change in the future and potentially require an enhanced monitoring role for the 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 year, which will no doubt continue into 2021/22 due to the continuing presence of the virus. While it is hoped that such restrictions will gradually be lifted as 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.

Increase in ‘cloud’ kitchens – ‘Cloud’ kitchens, also known as ghost kitchens, refers to food that is prepared at separate premises rather than a restaurant. This is a relatively new format, whereby orders are placed online, without the option for the public to enter the premises. While a number of these businesses are legitimate and regulated, others are operated out of home kitchens by people with no training and could be sold without clear information on ingredients and allergy information via social media platforms such as Facebook.

Allergen Control and Management – Food interventions completed by food safety and food standards officers continue to identify the failure of food businesses to understand their legal duties in controlling and managing allergens. Safe Sustainable Authentic Food Wales, has formed a working group to develop a toolkit to ensure a consistent approach amongst local authorities to address the enforcement of allergens. Representatives of SRS actively participate in this area of work and it is hoped that once complete all officers will be trained to ensure its effective implementation. Created by the Directors of Public Protection Wales, SSAFW is a collaboration between the Food Standards Agency, Welsh Government and local authorities in Wales with representation from the food industry and consumer bodies.

Natasha's Law – The new law, known as Natasha's Law, comes 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. It is anticipated regulations will 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. Furthermore, officers will need to be trained in the new requirements, carry out additional checks during inspections, all of which could subsequently result in more enforcement actions in relation to non-compliances identified.

FSA Feed Audit – In February 2020, the Food Standards Agency conducted an audit of our delivery of feed controls across the three local authority areas. Authorities are audited against the Feed and Food Law Enforcement Standard which sets out the minimum standards of performance expected

from local authorities. The last year has seen significant work undertaken within the Service in consolidating procedures, the recording of information and making improvements with regard to the Feed and Food register, and any recommendations contained within the report will build upon this work to further improve the delivery of feed controls. Food Standards Agency audits provide local authorities with recommendations for improvement and recognise good practice, and the service has agreed the audit report arising from the recent audit and are taking forward the recommendations made.

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, June, July and August were exceptionally busy for events. 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. Whilst under the current Covid-19 restrictions major events are not operational it is envisaged that greater emphasis on hygiene control will be required when events begin operation again.

Retention of staff –Filling vacancies continues to be challenging and SRS has struggled to recruit suitable individuals into certain areas of the service. The shortage of applicants with correct skills, abilities and experience in the different professions has created a more competitive market. These shortages, attributable to an aging professional demographic, increasing turnover due to retirement and a reduced investment in sponsorship of students by the Councils, have to be addressed if we are to deliver effective regulatory services. Consequently, SRS managers drafted a recruitment and retention strategy for the service which was approved by the Joint Committee in September 2019. The strategy sets out how SRS will recruit and retain officers with the requisite skills, experience, behaviours and beliefs to undertake their job roles effectively. Our 2020 staff survey shows that the majority of our officers are content with their employment within the SRS, yet the SRS delivery model remains as if we are unable to attract, recruit and retain a high calibre workforce. The impact of the new strategy will be monitored over time to determine its efficacy.

Review of ICT and mobile working solutions – 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.

Increase in enforcement action by the service –The impact of enforcement action required as a result of the aforementioned FSA audit report has seen a vast increase in investigations conducted by the department. The FSA requested that a report be considered for prosecution for every premise

issued with a Food Hygiene Rating of zero or for every voluntary closure issued. The volume of work required for preparation of such reports should not be underestimated. As a result of the aforementioned process change we have seen a vast increase in the number of investigations initiated. It should be noted that whilst officers are conducting the investigations the numbers of inspections conducted are reduced which further impacts on delivery of the programme of inspections.

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 increased 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.

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 Stuff 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 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 2020-21

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 have developed a Recovery Plan to enable local authority food teams identify and focus on those food businesses that are trading and pose the greatest risk to public health. The planned programme for 2021/22 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.

A Rated Food Businesses

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

B rated businesses

B rated businesses will receive an intervention only if intelligence received suggests risks have increased and when a new business registration is received during 2021/22.

The full programme of conducting interventions at B rated businesses, including any backlog, will resume in 2022/23.

C rated businesses

C rated businesses will receive an intervention only if intelligence received suggests risks have increased and when a new business registration is received during 2021/22.

The inspection of C rated programmed interventions will resume in April 2022 with initial focus on those that are less than broadly compliant. The remaining programmed C rated broadly compliant businesses will be inspected throughout 2022/23.

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 2021/22 D rated businesses will receive an intervention only if intelligence received suggests risks have increased and when a new business registration is received.

The inspection of D rated programmed inspections will resume in 2022/23 with initial focus on those that are less than broadly compliant.

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 2021/22 the service will continue the use of an alternative enforcement strategy for E rated food establishments.

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 2021/22.

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.

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 recent Covid-19 pandemic has had an adverse effect on the ability to board vessels and aircraft for inspection due to the risk of transmission of infection with many issues having to be dealt with remotely. The Service will continue to respond to reports of illness on board in accordance with International Health Regulations and will look to reinstate normal boarding operations once health and safety risk assessments identify that it is permitted to do so.

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 2021/22

The table below illustrates the risk ratings of premises, the intervention frequencies and the total number of interventions to be delivered during 2021/22.

Food Safety Intervention Plan 2021/22					
Risk Category	Intervention frequency	Number of Interventions due at start of year (Including any backlog)			
		Bridgend	Cardiff	Vale of Glamorgan	
HIGH RISK	A	6 mths	4	14	6
	B	12 mths	0	0	0
	C	18 mths	0	0	0
	High Risk Total		4	14	8
MEDIUM-LOW RISK	D	2 years	0	0	0
	E/AES *	3 years	306	571	253
	Medium to low Risk Total		306	571	253
NEW BUSINESSES	Unrated (New business identified at 1 April o/s from 20/21)		223	712	226
	Unrated (New business identified during course of year)		Est 248	Est 667	Est 224
	Unrated total (Estimate based on 2020/21 no. identified)		471	1379	469
REVISIT	Revisits (Estimate based on 2020/21 actual undertaken)		19	149	24
TOTALS			800	2113	754

Source: Planned Inspection Monitoring Programme

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.

Shared Regulatory Services 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 expanded its training offer to business and now runs Level 2 Award in Allergen Awareness and Food Control in Catering and has very recently become the first in Wales to provide the Allergy Awareness training course devised by the Allergy UK charity. In addition, we are promoting the Allergy Aware Scheme which allows business to demonstrate their commitment to providing safe food and consumers with food allergies. While the Scheme will be administered by Allergy UK, SRS officers will carry out audits to food premises on behalf of the charity.

Targeted action – In order to tackle poor compliance with food hygiene regulations, SRS will undertake targeted exercises, inspecting businesses within specific areas of the region. These exercises aim to tackle poor compliance in a more efficient and effective way, focussing on one area at a time.

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. Work was undertaken during last financial year to ensure all areas are using the same assessment model ensuring a harmonised approach.

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 have developed a Recovery Plan to enable local authority food teams identify and focus on those businesses that are trading and pose the greatest risk to public health. The planned programme for 2021/22 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 a new business registration is received during 2021/22.

New business

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

Unverified businesses

Unverified 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 2021/22				
Risk Category	Intervention Frequency	Number of Interventions due at start of year (including any backlog)		
		Bridgend	Cardiff	Vale of Glamorgan
High Risk	12 mths	5	15	0
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 20/21)	213	610	233
	Estimate based on new business identified during 20/21	Est 200	Est 560	Est 217
	Total (Estimate based on 2020/21 no. identified)	413	1170	450
Unverified businesses	This relates to errors within the database on set up	68	517	10
Re-visits	Estimate based on 2020/21 undertaken	2	14	1
Total		488	1716	461

Food Standards Projects

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 is 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 will utilise social

media to identify unregistered food businesses within the region to assess compliance in relation to food standards.

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.

In addition SRS will participate in:-

- a number of regional projects agreed by the Glamorgan Group (GG) which include the following:
 - Allergens kebabs and takeaways– tests to determine presence of milk (Glamorgan Group)
 - Vegan claims (Glamorgan Group) - descriptions of pre packed foods from catering establishments (Casein (Diary).
 - Natasha’s Law – sampling in relation to new Regulation introducing requirements on food businesses to supply foods information (including allergens) on the packaging of foods which are prepacked and sold to consumers on the food premises.
- A FSA funded project that is yet to be confirmed and will be intelligence led and relate to current emerging issues.
- 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. 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 Shared Regulatory Service 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
A	147-200	At least every 12 months (1yr)
B	122-146	At least every 24 months (2yrs)
C	106-121	At least every 36 months (3 yrs)
D	85-105	At least every 48 months (4 yrs)
E	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 2021/22				
Risk Category	Intervention Frequency	Number of Interventions due at start of year (including any backlog)		
		Bridgend	Cardiff	Vale of Glamorgan
High Risk A rated	12 mths	0	0	0
Medium Risk B rated	24 mths	2	2	4
Medium risk C rated	36 mths	3	1 + 1 Med	0
Low risk D rated	48 mths	1	4	9

Low risk E rated	60 mths	27+40 low	3 +1 Low	138
Unverified	This relates to errors within the database on set up	154	8	4
New business	New business identified at 1 April o/s from 20/21)	30	20	88
	Estimate based on new business identified during 20/21	13	2	16
	Total (Estimate based on 2020/21 no. identified)	43	22	104
Total		270	42	259

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 2020/21 it is estimated that for the period 2021/22 the following numbers of complaints could be received.

Complaint type	Bridgend	Cardiff	Vale of Glamorgan
Food Hygiene	84	243	62
Food Complaints	28	104	25
Food Standards	14	50	24
Feed Safety	0	1	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 the regulated and the regulator bringing benefits to both parties. It offers local authorities the opportunity to develop a constructive partnership with a business that can deliver tailored “assured” advice and co-ordinated and consistent enforcement for the business and provides new funding arrangements, 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 agreement that provides assured advice, ensures consistency of regulation between local authorities and reduces duplication of inspections and paperwork. The Office for Product Safety and Standards is promoting 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 assured advice in Wales. SRS is currently supporting 10 of our 28 partnerships in this new capacity 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.

The assured advice given by a Primary Authority must be adhered to by other local authorities. The Primary Authority can block enforcement if the enforcing authority has not considered the assured advice the Primary Authority has given to a business. The Primary Authority may also develop inspection plans which enforcing authorities must follow.

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). SRS will focus on the supply of food supplements containing banned ingredients (DNP and DMAA) from on line sellers and gyms within the Local Authority.

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 2021-22 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 2021/22. 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 2020 can be found in the Communicable Disease and Health Protection Service Plan 2021/22.

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. The 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 2020.

Communicable Disease Intervention Plan 2021			
Type	Number of Interventions estimated at start of year based on those received in the previous year (2020)		
	Bridgend	Cardiff	Vale of Glamorgan
Total No. of food poisoning notifications	81	182	69
No. of food related outbreaks	0	0	0
Total	225	469	165

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 2021/22 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 2018/19	Budget 2019/20	Budget 2020/21	Budget 2020/21			
	Bridgend Cardiff Vale of Glam	Bridgend Cardiff Vale of Glam	Bridgend Cardiff Vale of Glam	Bridgend	Cardiff	Vale of Glamorgan	Total
Staffing	3,196,240	3,019,200	2,142,885	438,295	1,249,704	438,295	2,126,294
Travel / Subsistence	60,870	62,070	33,375	7,338	20,348	6,724	34,410
Sampling	87,170	72,710	34,320	7,554	19,846	6,921	34,321
Supplies and services	161,221	140,140	71,645	16,252	42,868	14,890	74,010
Income	-	-	-20,000	-4,534	-11,312	-4,154	-20,000
TOTALS	3,505,501 This figure relates to the entirety of the teams involved in food. This figure does not reflect the allocation to food only.	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	464,905	1,321,45	462,676	2,249,035

Prior to 2020/21, the budget presented for food and feed safety has 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. Last year for the first time, efforts were made 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 2021/22. 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).

Function	Bridgend		Cardiff		Vale		Total [FTE]	
	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 staff resourced to work on Food and Feed safety and related matters (in terms of full time equivalents FTE) at 1st April 2021. It should be noted however that this resource has been significantly reduced this year, due to a number of employees being re-purposed to support the Test, Trace, Protect Scheme and one officer on maternity leave. The total across Food and Feed Standards is **36.70 FTE**. 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.

Food Safety					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
Head of Shared Regulatory Services	Management of Environmental Health, Trading Standards and Licensing functions	Trading Standards Officer	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	MSc Environmental Health, Diploma in Trading Standards (DTS)	0.075	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)	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.02	0.04	0.02
Team Manager (Food and Port Health)	Food safety management and liaison.	Environmental Health Officer (EHORB registered, competent to inspect all categories)	0.45	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	0.1	0.2	0.1
Commercial Services Officers (Food and Port Health)	Food safety inc. 2 FTE for Port Health	Environmental Health Officer	4.4	15.05	4.4
Commercial Services Officers (CD)	Community health (food poisoning and infection control)	Degrees in in Environmental Health or equivalent science	0.2125	0.425	0.2125
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Environmental Health Officer	0.775	1.55	0.775
Technical Officer (Food and Port Health)	Food safety and port health	Degrees in in Environmental Health or equivalent science	0.5	2	0.5
Technical Officer (CD)	Community health including food poisoning	Degrees in in Environmental Health or equivalent science	0.042	0.084	0.042

Commercial Services Officer (Business Engagement and Training) industry	Food Safety & Food Standards at Manufacturing/Industrial Premises	Ordinary & Higher Certificates in Food Premises inspection, Higher Certificate in Food Control	0.25	0.5	0.25
		Total Professional staff	6.4045	19.179	6.4045
		Overall total professional staff	31.988		
Administrative support			1.75	3.75	1.75
		Totals	8.1545	22.929	8.1545
		Overall Total (FTEs)	39.238		

There is an estimated shortfall of **7.3 fte's** 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	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)	Diploma in Trading Standards (DTS), Lead Auditor Qualification	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	0.05	0.2	0.05
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	0.1	0.1	0.1
Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.	Diploma in Trading Standards (DTS) or Diploma in Consumer	0.425	0.85	0.425

		and Trading Standards (DCATS).			
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Environmental Health Officers & Trading Standards Officers	0.275	0.55	0.275
Technical Officer (Trading Standards)	Food standards and feed hygiene functions	DCATS Food and Agriculture module or equivalent.	0.0875	0.175	0.0875
		Total Professional FTE	1.0075	2.015	1.0075
		Overall total professional FTE	4.03		
Administrative support	.		0.02	0.02	0.02
		Overall total	1.0275	2.035	1.0275
		Overall Total (FTEs)	4.09		

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 will enable a multi skilled approach to the enforcement of food during 2021/22. 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. This would result in an estimated shortfall of **3.45 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.

Please note a number of inspections relating to food standards are undertaken alongside food hygiene inspections as previously detailed above. As such the above table relating to food standards enforcement applies to specified higher risk premises which fall within the remit of the Trading Standards team.

Feed 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)	Diploma in Trading Standards (DTS), Lead Auditor Qualification	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	0.0067	0.0067	0.0067
Team Manager (Environment)	Management of Animal Health and Welfare Team	BSc,	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/Industrial 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	0.098	0.037	0.098
		Total Professional FTE	0.227	0.223	0.227
Administrative support included with food hygiene					
		Totals			
		Overall Total (FTEs)	0.678		

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

4.3 Staff Development Plan

The creation and development of the new Shared Regulatory Service across three distinct areas, together with the implementation of a new structure and new ways of working presents many challenges for the new Service and its workforce.

Shared Regulatory Service’s approach to managing this 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, will provide 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 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 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 2020/21

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 2020/21 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 severely affected by the Covid 19 pandemic which led to the suspension of visits and the closure of businesses at various times throughout the year. This has inevitably impacted on performance. The percentage achieved relates to performance at the end of the year as the programme has developed.

Food Hygiene Intervention Plan 2020/21										
Risk Category		Number of Interventions due at start of year (including any backlog)								
		Bridgend			Cardiff			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	A	4	2/2	100%	34	15/17	88.24%	4	1/1	100%
	B	65	28/59	47.46%	197	87/177	49.15%	64	17/59	28.81%
	C	477	62/435	14.25%	934	201/812	24.75%	407	40/394	10.15%
	High Risk Total	546	92 /496	18.55%	1165	303 /1006	30.12%	475	58 /454	12.77%
MEDIUM-LOW RISK	D	158	1/153	1.87%	388	4/359	1.11%	156	1/52	1.92%
	E/AES*	220	11/210	5.24%	510	71/1211	5.86%	194	18/181	9.94%
	Medium to low Risk Total	378	12 /363	3.30%	898	75 /605	12.39%	350	19 /233	8.15%
NEW BUSINESSES	Unrated (New business at 1 April)	47	29 /254	11.42%	303	117 /667	17.54%	55	44 /247	17.81%
	Unrated (New business identified during year)	Est 169			Est 555			Est 188		
	Total unrated	216	29	11.42%	858	117	17.54%	243	44	17.81%
REVISIT	Re-visits	Est 189	19	N/A	Est 803	149	N/A	Est 281	24	N/A
TOTALS		1329	152		3724	644		1349	145	

High Risk Food Business (A – C Rated)

Whilst priority was given to A and B rated premises, the closure of businesses and the suspension of visits as a result of the Covid-19 pandemic severely affected the service's ability to undertake programmed inspections. Furthermore the capacity of the service to undertake programmed inspections was reduced further due to the repurposing of team members to the Test, Trace and Protect service. This coupled with the backlog of C rated businesses that occurred pre-covid has led to a significant drop in performance during 2020/21 impacting on the overall result for high risk premises.

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 high risk food premises, only 3.30% of medium to low risk interventions were carried out in Bridgend, 12.39% in Cardiff and 8.15% in the Vale of Glamorgan. As indicated previously this is due to the impact of the Covid-19 pandemic and the repurposing of team members to Test, Trace and Protect which reduced capacity.

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 2020/21 a total of 1031 new businesses were identified across the region, with 597 of these being in Cardiff representing 57.90% of new businesses across the three areas. In Bridgend and the Vale of Glamorgan 211 and 223 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 2021/22 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

The size and scope of SRS means that the number of appeals received by the service against the Food Hygiene Rating awarded to a business is considerably higher than the rest of Wales. Dealing with these matters can be resource intensive and consequently impacts on the capacity of team managers. During the last year SRS received 9 appeal applications (1 Bridgend, 7 Cardiff and 1 in the Vale). This is a significant reduction on previous years, likely caused by the reduction in inspections carried out as a result of the Covid pandemic.

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 participates in a number of planned food safety surveys which entail various sampling programmes across a range of businesses. Due to the Covid-19 pandemic however, no such activities were undertaken during 2020/21.

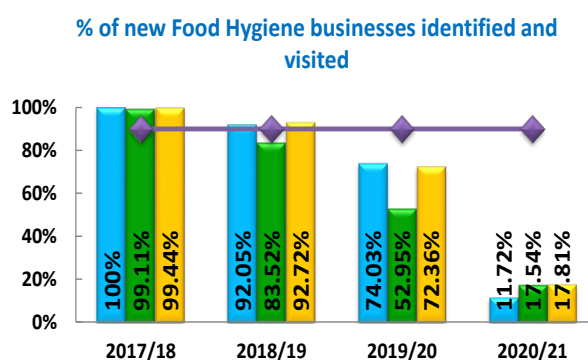
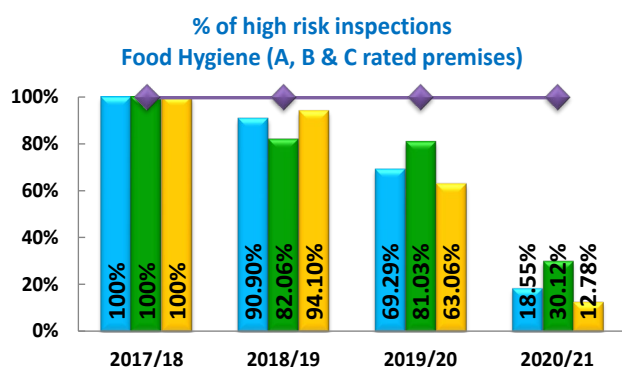
Managing E.coli risk within the Council - The partner councils all have a role in procuring and providing food to a range of establishments. Significant progress has been made to address the E.coli risk at Cardiff Council. A corporate Action Plan is in place and updated regularly. The SRS recognises the need to maintain this momentum to implement and develop these corporate procedures and as such will continue to support this regime in 2021/22. 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. This was further evident in 2019/20 where considerable advice and support was provided to Bridgend and Vale Catering Services. Supporting these “in-house” regimes is not a core function of the Shared Service and any work undertaken requires funding from the partner Councils.

Providing additional advice and support to food businesses - With Covid-19 having been the greatest public health risk over this period many resources were redirected at ensuring suitable control measures were put in place by food businesses to prevent its onwards spread and that businesses understood the changing landscape of advice, guidance and legal requirements issued by Welsh Government and Public Health Wales. Such interventions included proactive mailshots to all businesses, assessments completed remotely and in person and a suitable response to various queries. In instances where a food business was identified as an exposure location for a potential cluster, visits were completed to identify any improvements to control measures that were required and information gathered on any employees/customers that may have been exposed to the risk of the disease for follow up by Test Trace and Protect Teams

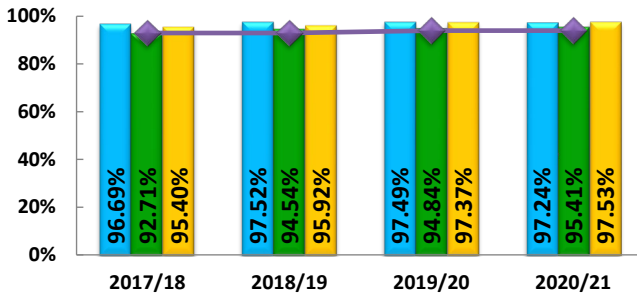
Performance Measures

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.

■ Bridgend ■ Cardiff ■ Vale of Glamorgan



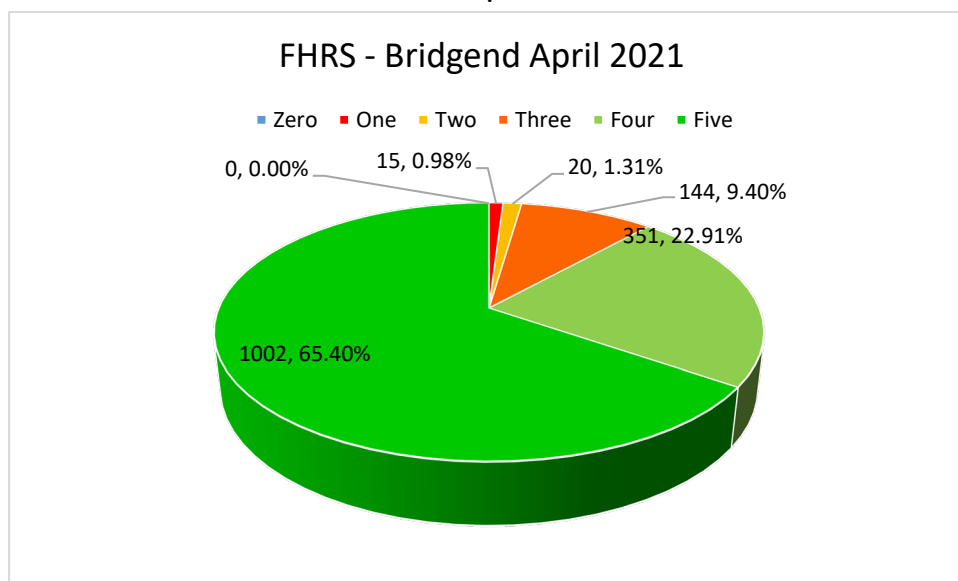
PAM 023 - % of food establishments that meet food hygiene standards

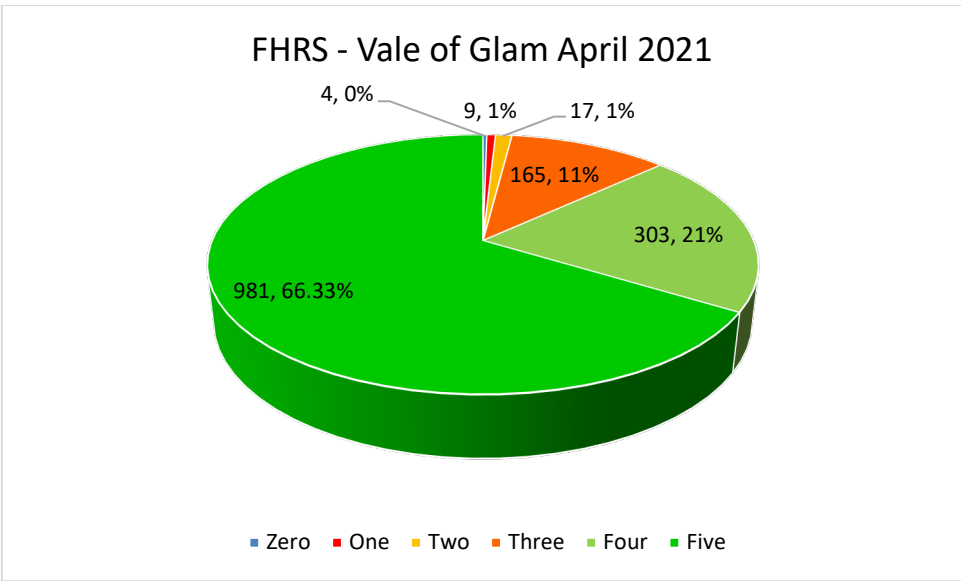
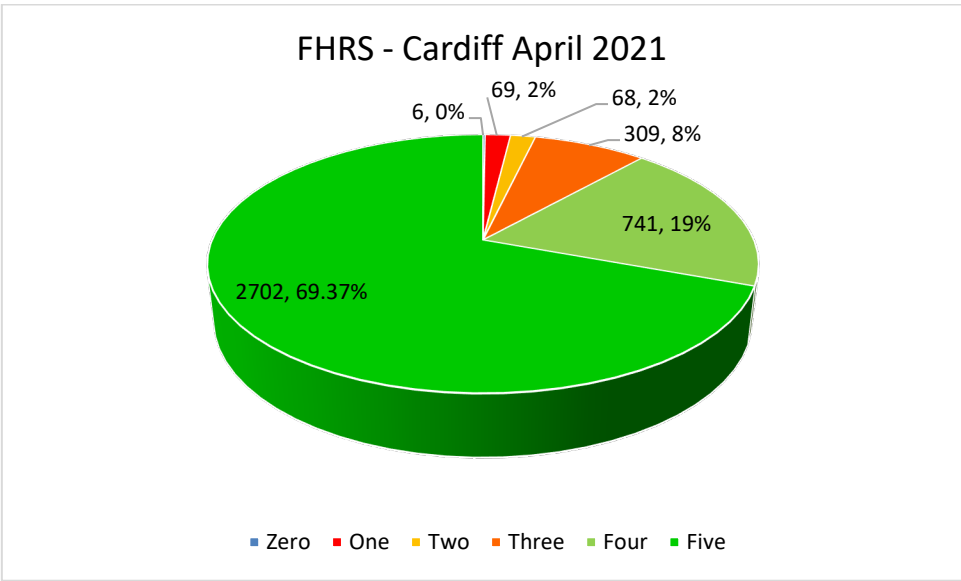


The broadly compliant figure indicates the number of businesses who have managed to achieve a food hygiene rating of 3 or above. Whilst SRS endeavours to improve compliance through advice, guidance or enforcement, ultimately the score achieved depends on the willingness of the food business operator to make and maintain improvements.

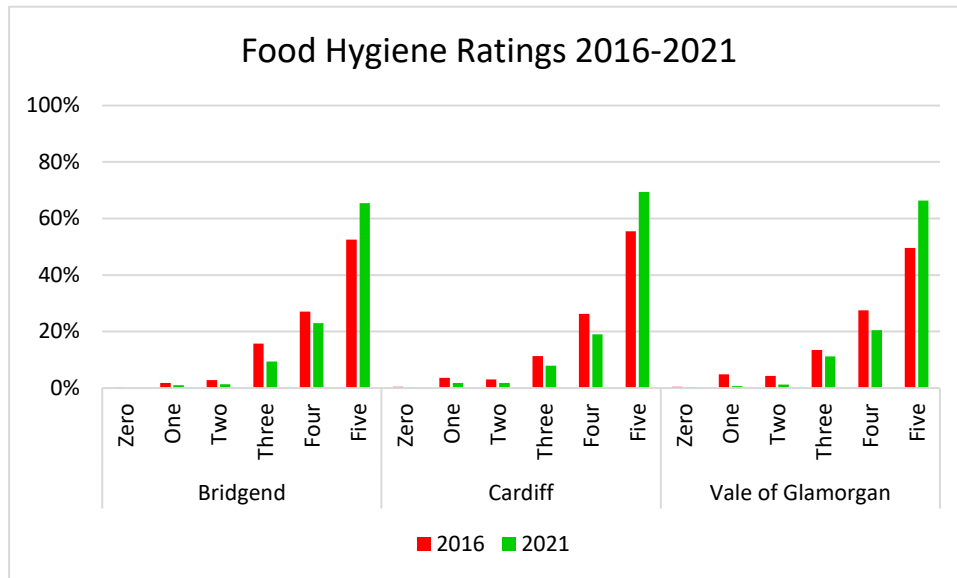
Broadly compliant businesses and the Food Hygiene Rating Scheme - In November 2013 a statutory food hygiene rating scheme was introduced throughout Wales where on receiving a food hygiene inspection, premises receive a hygiene rating from zero to five. Businesses with a food hygiene rating of 3 and above 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. During 2020/21 the percentage increased in Cardiff and the Vale of Glamorgan while Bridgend stayed at a similar high level to the previous year. (Bridgend from 97.49% to 97.24%, Cardiff 94.84% to 95.41%, Vale of Glamorgan 97.37% to 97.53%). The results show a positive upward trend, year on year, exceeding targets and highlighting the growing number of businesses that are improving their standards. This can be attributed to the success of the intervention programme for food businesses and ensuring that any food safety issues identified are followed up by appropriate enforcement and revisits to ensure compliance with food safety law. Furthermore the positive impact of Food Hygiene Rating Scheme encourages businesses to strive for a better rating.

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.





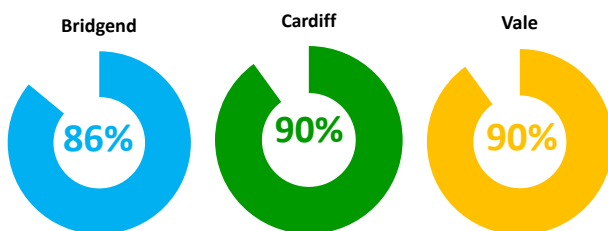
The Scheme has had a positive impact in improving standards in food businesses and the following graph demonstrates how over a 5 year period the percentage of businesses that have been granted a '5' rating, the highest rating that can be achieved, has increased while the number of low scoring businesses has dropped.



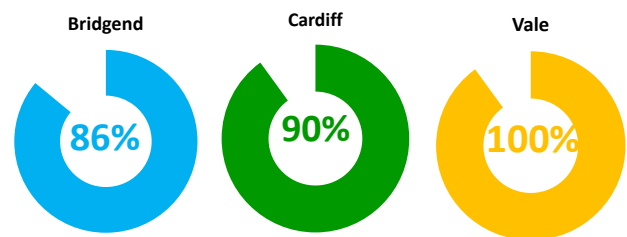
Customer Satisfaction

During 2020/21 questionnaires were sent to food business customers following an inspection to gauge their views on the inspection process across the 3 areas. A flavour of the results received can be found below and suggest that SRS are having a positive impact on food businesses and that customers are satisfied with our services.

Businesses who felt food safety inspection helped them improve standards of compliance 2020/21



% of food businesses satisfied with overall level of service 2020/21



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 2020/21, the service successfully prosecuted a number of individuals/businesses in relation to food offences and the following cases showcase a few selected examples.

- Cardiff restaurant and takeaway fined for numerous food hygiene offences** – During a routine inspection of a restaurant and takeaway, inspecting officers discovered a significant infestation of cockroaches which led to the premises voluntarily closing. Numerous follow up visits were conducted however cockroach activity remained and no improvements were observed. The business

was issued with a food hygiene rating of 0 and a prosecution instigated for numerous offences. The court considered committing to the Crown Court due to the seriousness of offences however the case was heard at the Magistrates Court where both owners received fines of £4000 and £3000 and ordered to pay costs of £350 and a victim surcharge of £181.

- **Cardiff restaurant owner received suspended prison sentence for food hygiene offences** – In another case, an inspection of a business in Cardiff officers found mouse and insect infestation throughout the ground floor and basement of the premises and no food hygiene management system in place and food being repackaged in the basement. Remedial notices were issued which were subsequently breached. The case was committed to the Crown Court for sentence and the judge considered the defendant’s culpability in respect of each offence was very high. The judge subsequently sentenced the owner to 6 months imprisonment for the food hygiene offences and 8 months imprisonment for breaches of the Remedial Notices to run concurrently and suspended for 2 years. Costs of £500 were awarded and a victim surcharge was applied of £140.

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

Food Hygiene Enforcement Actions 2020/21			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	1	12	4
Seizure, detention and surrender of food	3	3	0
Suspension/revocation of approval or licence	0	4	0
Hygiene Emergency Prohibition Notice (Formal)	0	0	0
Prohibition Order	0	0	0
Simple caution	0	0	0
(Hygiene)Improvement notice	10	20	9
Remedial action and detention notices	1	3	2
Written Warnings	138	395	118
Prosecutions concluded	0	14	2

6.1.2 Review of Food Standards Interventions 2020/21

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 2020/21 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.

Food Standards Intervention Plan 2020/21

Risk Category	Number of Interventions due at start of year (including any backlog)								
	Bridgend			Cardiff			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	11	11/11	100%	23	15/23	65.22%	3	2/3	66.66 %
Medium Risk	108	14	N/A	330	78	N/A	40	7	N/A
Low Risk	182	12	N/A	205	93	N/A	168	40	N/A
New Business	Est 236	34/267	12.73%	Est 841	168/ /754	22.28%	Est 247	29\249	11.65%
Unverified businesses <small>Errors within the database on set up</small>	86	18	20.93%	617	100	16.21%	15	5	33.33%
Re-visits	0	2	N/A	14	14	N/A	5	1	N/A
Total	623	91		2030	468		478	84	

High risk interventions

During 2020/21, 100% of the inspection programme was achieved in Bridgend, however Cardiff and the Vale were not completed fully. This represented 8 visits outstanding at the end of the year in Cardiff and one in the Vale of Glamorgan.

Medium and low risk interventions

During 2020/21 the food standards element of the service was resourced to only deliver an inspection programme for high risk and new businesses. As previously described, food hygiene officers were trained in food standards to facilitate the completion of food standards inspection at the same time as the food hygiene inspection. A food standards protocol was subsequently devised to detail the type of premises where this apply. The type of premises are generally of a medium to low risk for food standards purposes.

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 50 interventions in medium and low risk interventions in Bridgend, 153 in Cardiff and 17 in the Vale of Glamorgan. This was a significant reduction on the previous year due to the suspension of inspections as a result of the Covid pandemic.

New Business

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.

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

Unverified 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 18 businesses in Bridgend, 100 in Cardiff and 5 in the Vale of Glamorgan being rated during 2020/21. There still remains a number of unverified businesses and these will need to be addressed during 2021/22.

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 2 re-visits were undertaken in Bridgend, 14 in Cardiff and 1 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:-

- **Allergens at Take-Away premises** - 46 food businesses providing take-away food were visited by officers who attempted test purchases of kebabs, Indian and Chinese dishes. Prior to purchase, the officer informed the business they had an allergy to an allergenic ingredient. A number of the businesses visited, were found to be satisfactory as they refused to sell the food requested because they knew that the food did contain the allergen declared. Food that was sold to the officer formed a sample which was subsequently analysed for the presence of the declared allergen.

All of the premises selling kebabs or Chinese foods were found to be satisfactory which was determined either through analysis of the sample purchased or their refusal to sell the food requested by the officer because they knew that the food did contain the allergen declared. However, of the 16 Indian take-away premises visited, seven premises supplied food that contained the allergen declared by the officer at the time of order. The premises that failed in this respect were issued with written warnings, provided with advice and either have or will be subject to follow-up sampling to ensure they had addressed the non-compliance.

- **Informal Sampling** - 16 visits were carried out with the intention of sampling as a result of food complaints received by the department or officers following-up concern identified during inspections. Most of these complaints concerned the information available regarding the presence of allergens in the product but some complaints concerned the presence of meat in foods described as vegetarian/vegan. Of the premises visited one sample concerning allergens and one sample described as vegetarian were returned as unsatisfactory. In respect to the failed vegetarian sample, the business was provided with advice and a written warning. The business will also be subject to future sampling to ensure future compliance. In the case of the allergen failure following re-visits the business was issued with a food improvement notice and is now subject to ongoing enforcement action

Prosecutions and enforcement action

In August 2020, SRS successfully prosecuted 2 defendants in relation to a Cardiff convenience store that was found to be selling out of date food at 2 visits made by officers. Simple cautions were not accepted but at court, both defendants pleaded guilty. Each was fined 7 x £59, ordered to pay costs of £150.00 and a victim support payment of £41.99 within 28 days.

Food Standards Enforcement Actions 2020/21			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	0	0	0
Seizure, detention and surrender of food	0	0	0
Suspension/revocation of approval or licence	0	0	0
Emergency Prohibition Notice (Formal)	0	0	0
Prohibition Order	0	0	0
Simple caution	0	0	0
Improvement notice	0	1	0
Written Warnings	2	22	4
Prosecutions concluded	0	2	0

Food Standards Sampling

Please find below a summary of the food samples taken by the commercial services TS team in the financial year 2020-2021:

Food Matrix	Analysis	Comments	Target Number	Number of samples taken	Satisfactory	Non satisfactory
Chinese Takaway	Allergens – Chicken Satay requested to test to determine presence of crustaceans	Glamorgan Group	9 - Cardiff	12	12	0
			3- Bridgend	0	0	0
			3 - VOG	3	3	0
Indian Take-away	Allergens - determine presence of Milk		9 - Cardiff	11	7	4
			3- Bridgend	3	2	1
			3 - VOG	2	0	2
Kebabs	Allergens - determine presence of Milk		9 - Cardiff	7	7	0

		3- Bridgend	4	4	0
		3 - VOG	4	4	0
Complaint samples	As required	Cardiff	12	10	2
		Bridgend	3	3	0
		VoG	1	1	0
Food Supplements	Nutrition & Health Claims	Cardiff	5	0	5

The reason for the shortfall in samples taken is due to lack of resources and other work priorities.

6.1.3 Review of Feed Safety Interventions 2020/21

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 2020/21 for Feed Safety and reports on the delivery of those interventions together with information on enforcement activities.

Feed Safety Intervention Plan 2020-21								
Number of Interventions due at Start of Year (Including any Backlog)								
Type	No. of inspections due							
Inland Feed inspections	Bridgend		Cardiff		Vale of Glam		Total	
	Due	Actual	Due	Actual	Due	Actual	Due	Actual
Manufacturer (A01-08 and R01-04)			1	0			1	0
Co Product Producer (R12)	1	0	4	0	2		7	0
Mobile mixer (R04)								
Importers								
Stores (R09)								
Distributor (A01-08, R01-03, & R05)					1	0	1	0
Transporter (R08)					2	0	2	0
On farm mixer (R10 Annex II)	7	0	2	0	12	0	21	0
On farm mixer (R11)	4	0	2	0	12	0	18	0
Pet food manufacturer (R06)			2	0	2	0	4	0
Supplier of feed materials/surplus food (R07)	11	8	9	5	0	0	30	13
Total inland feed inspections	23	8	20	5	31	0	74	13
Feed Hygiene at Primary Production inspections								
Livestock farms (R13)	230	22	11	0	127	12	378	34
Arable Farms (R14)	1	0	3	0	11	0	15	0
Total Feed Hygiene at Primary Production inspections	231	22	14	0	148	12	393	34
Total feed premises/inspections	254	30	34	5	179	12	467	47

The table above shows that 467 inspections were planned, and 47 completed. There were a number of variations to the plan as follows:-

Type	Reason for variation
Co Product Producer (R12)	A number of inspections were allocated, however due to restrictions imposed as a result of Covid-19 and advice from the FSA not to carry out inspections these were unable to be completed.
Distributor (A01-08, R01-03, & R05)	
Transporter (R08)	
On farm mixer (R10 and R11)	
Pet food manufacturer (R06)	
Supplier of feed materials/surplus food (R07)	30 inspections were allocated, however 13 were actually completed during the year. This was due to restrictions imposed as a result of Covid-19 and advice from the FSA not to carry out inspections, these were unable to be completed.
Livestock farms (R13)	378 inspections were identified and allocated as part of a data cleansing exercise in identifying more premises that required inspection. We had planned to get in a contractor to assist in clearing these inspections, however due to the impacts of Covid-19 only 34 were actually completed during the year.
Arable Farms (R14)	15 inspections were allocated, however none were completed during the year. This was due to restrictions imposed as a result of Covid-19 and advice from the FSA not to carry out inspections, these were unable to be completed.

High risk businesses

The number of high risk interventions due at the beginning 2020/21 was not identified in the Intervention Plan for that year, however a target of 100% was assigned through the SRS performance framework. During 2020/21 one high risk inspection was programmed for Bridgend, two in Cardiff and none in the Vale of Glamorgan, however no inspections were undertaken due to the Covid 19 pandemic and advice from the FSA to suspend inspections. These programmed visits have been carried over to 2021/22.

New business

The estimated number of new businesses due an intervention at the beginning of 2020/21 was not identified in the Intervention Plan for that year, however a target of 80% was assigned through the SRS performance framework. The Service failed to meet that target achieving 12.90% in Bridgend, 0.00% in Cardiff and 9.7% in the Vale of Glamorgan. Once again this was largely due to the Covid-19 pandemic and the suspension of inspections following advice from the FSA. The number of new feed businesses is relatively low however the number outstanding at the end of the year relates to 98 premises. Database cleansing during the year identified a number of premises for which no future planned inspection date had been calculated and in resolving this issue a significant number of these have appeared as 'new' premises for which no visit had been completed.

Re-visits

The estimated number of re-visits due at the beginning of 2020/21 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 2020/21

FSA Feed Audit

The effective delivery of feed law controls forms a crucial, but perhaps less visible, component of safeguarding the whole food chain, from farm to fork. Since 2015, feed law enforcement in Wales has been administered on a six-region basis to complete an agreed annual programme of interventions, and SRS forms one of these regions. In February 2020, the Shared Service was audited by the Food Standards Agency to ensure the timely, appropriate, proportional and consistent delivery of official feed controls across the three local authority areas. The Auditors carried out database checks, scrutinised SRS policies, interviewed officers and carried out compliance reality checks at local business premises. Feedback over the course of the audit was constructive and positive, with the auditors recognising and acknowledging the significant amount of work that had gone into creating and refining the SRS database for Feed since the inception of SRS.

The FSA has recently issued its audit report for SRS in which it sets out the four possible assurance assessments that could have been awarded, ranging from Unsatisfactory through Limited, Moderate and finally Substantial assurance. The audit outcome for SRS is the moderate assurance status; 'The system for delivering official controls requires some improvement to fully demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance'. An action has been agreed to address the points raised by the auditors as requiring improvement, and a number of actions have already been completed

6.1.4 Complaints

Based on the requests received during the previous year, it was estimated that the service would receive 924 service requests during 2020/21, however the actual number was 635 (Bridgend 126, Cardiff 398 And Vale 111). The table below provides a breakdown of the estimated number and the number actually received and investigated.

Complaint type	Bridgend		Cardiff		Vale of Glamorgan	
	Estimate	Actual	Estimate	Actual	Estimate	Actual
Food Hygiene	138	84	415	243	122	62
Food Complaints	24	28	106	104	24	25
Food Standards	11	14	65	50	16	24
Feed Safety	0	0	1	1	2	0
Total	173	126	587	398	164	111

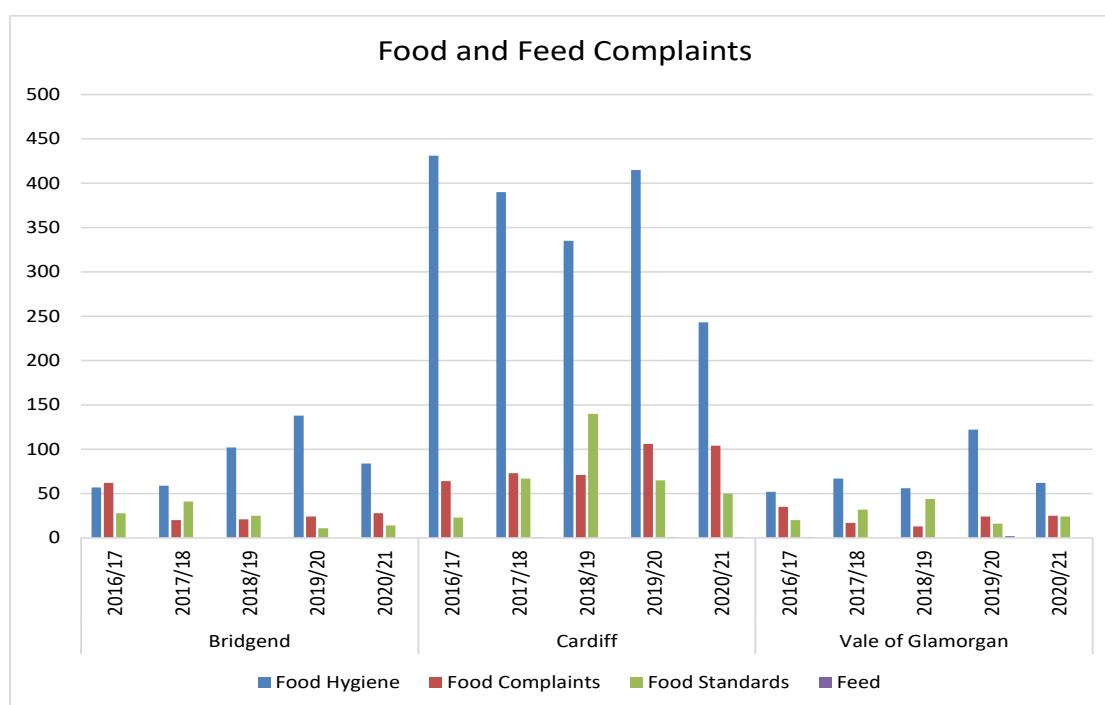
The table below shows the number of food and food hygiene complaints received by the service during 2020/21 along with the timeliness of response in accordance with the set target date set.

Complaints	Bridgend			Cardiff			Vale of Glamorgan		
	No. received	Target days	% inside target	No. received	Target days	% inside target	No. received	Target days	% inside target
Food Hygiene									
Food Practices	22	3	90.91%	29	3	96.55%	14	3	100%
Food Premises	57	1-3	89.47%	192	1-3	85.42%	50	1-3	94%
Water disconnections	22	1	86.36%	93	1	92.47%	10	1	80%

Accumulation of refuse	1	3	100%	1	3	100%	0	3	N/A
Food									
Food chemical	1	1	100%	2	1	100%	1	1	100%
Food (foreign body)	20	3	100%	51	3	90.20%	19	3	94.74%
Food (microbiological)	4	1-3	100%	56	1-3	89.29%	7	1-3	100%
Food out of condition	5	3	100%	0	3	N/A	2	3	100%
Food unsafe	2	3	100%	1	3	100%	0	3	N/A
Total no. received	134			425			103		

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 1 complaint was 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.

Service Requests	Bridgend			Cardiff			Vale of Glamorgan		
	No. received	Target days	% inside target	No. received	Target days	% inside target	No. received	Target days	% inside target
Alleged food poisoning	2	1	100%	7	1	100%	0	1	N/A
Approval application	0	10	N/A	0	10	N/A	1	10	100%
Covid 19 related	165	1	70.91%	352	1	74.72%	153	1	65.36%
Covid-19 complaints	0	5	N/A	1	5	100%	0	5	N/A
Export Certificates	0	3	N/A	1	3	100%	1	3	0%
FHRS Appeal	1	21	100%	6	21	83.33%	1	21	100%
FHRS early publication	0	14	N/A	7	14	100%	1	14	100%
FHRS Non display	7	3	85.71%	20	3	85%	2	3	100%

FHRS Promo Regs	0	5	N/A	1	5	100%	0	5	N/A
FHRS Re-score	1	5	100%	17	5	88.24%	2	5	100%
FHRS Right to reply	0	3	N/A	2	3	100%	0	3	N/A
FOI request	5	14	60%	19	14	100%	4	14	75%
Food Advisory visit	4	3	100%	11	3	81.82%	4	3	100%
Food Delivery Service	1	10	100%	0	10	N/A	0	10	N/A
Food hygiene enquiry	178	5	94.38%	653	5	94.33%	164	5	93.90%
Food registration	43	5	88.37%	106	5	93.40%	65	5	89.23%
FSA Food Alert	0	1	N/A	2	1	100%	0	1	N/A
FSA Information Notification	3	5	100%	5	5	100%	5	5	100%
Planning consultation	1	10	100%	5	10	100%	1	10	100%
Primary Authority	1	14	100%	12	14	100%	31	14	100%
Referral from other LA	0	3	N/A	1	3	100%	0	3	N/A
Request for FHRS sticker	0	3	N/A	6	3	100%	1	3	100%
Request from FSA	2	10	100%	2	10	100%	0	10	N/A
Salmonella notification	1	1	100%	0	1	N/A	0	1	N/A
Service complaint–Food	0	3	N/A	0	3	N/A	0	3	N/A
Total no. received	415			1236			436		

6.1.5 Home Authority Principle and Primary Authority

SRS now has some 28 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, twenty one 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
- The Bannatyne Group plc
- Craft Bakers Association
- Hallmark Care Homes
- HC-One Ltd
- Mitchells and Butlers
- One Stop Ltd
- Sainsbury's

- Tesco
- Waitrose
- Wine and Spirit Trade Association

6.1.6 Advice to business

During 2020/21 Shared Regulatory Services has assisted businesses 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 2020/21 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 co-ordination 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 2017 and 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. It should be noted that these were however suspended due to the Covid pandemic during the last year.
- **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 £130 +VAT is charged for a 2 hours on site advice visit tailored to the businesses needs with a follow up written report. During 2020/21 4 businesses approached the service seeking advice and support under the paid for advice service that we offer.

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 2020/21 which are highlighted in Section 6.1.2 of this Plan.

Feed Safety

No feed sampling programme was agreed for 2020/21.

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 2020/21 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 2021/22.

Communicable Disease Intervention Plan 2020/21

Type	Number of Interventions estimated at start of year and the actual number carried out					
	Bridgend		Cardiff		Vale of Glamorgan	
	Due based on estimate	Actual	Due based on estimate	Actual	Due based on estimate	Actual
Total No. of food poisoning notifications	164	81	521	182	172	69
No. of food related outbreaks	0	0	3	0	0	0
Total	164	81	523	182	172	69

In 2020, SRS was notified of 33,297 cases of communicable disease of which 33108 were laboratory confirmed but only 1% (337) were confirmed food poisoning cases and 189 unconfirmed (suspected) food poisoning cases.

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

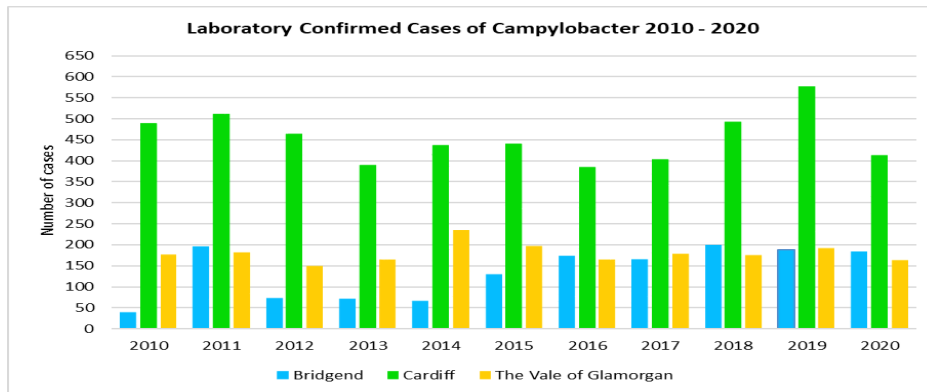
	Notified CD Cases (¹ CFP)	Unconfirmed CD Cases	Total CD Cases
Bridgend	9281 (81)	35	9316
Cardiff	19122 (182)	139	19261
Vale	4705 (69)	15	4720
TOTAL	33108 (337)	189	33297

¹CFP – confirmed food poisoning as applied in the ‘Disease’ tab in Tarian

As the number of communicable disease cases increased substantially during 2020 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 for approximately 4½ months of 2020.

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.

Graph: Reported cases of Campylobacter from 2010 – 2020



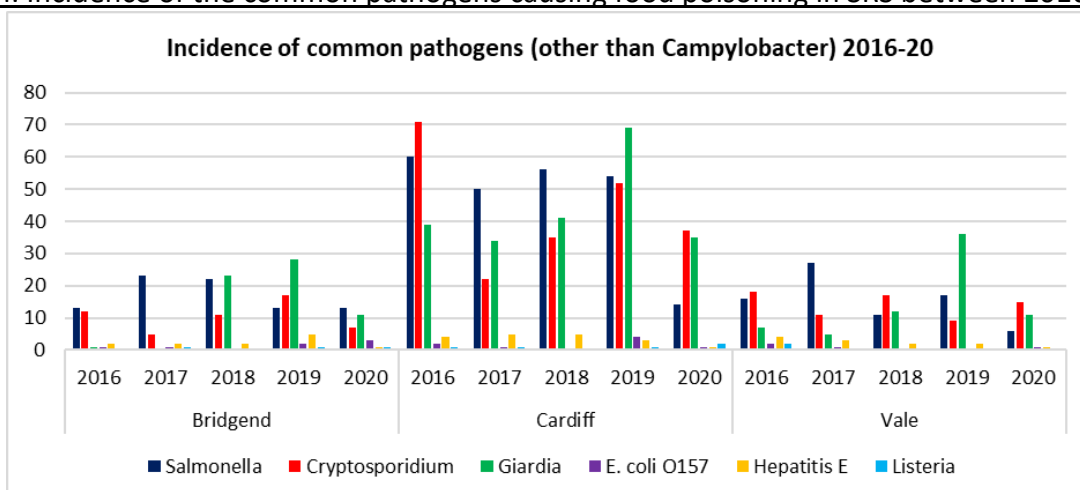
Pathogens of public health significance (other than Campylobacter) commonly require more detailed investigation; either because the pathogen can be readily spread within the community, or because of the seriousness of the infection. The need to complete enhanced interview questionnaires to identify close 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 2020.

Graph: Incidence of the common pathogens causing food poisoning in SRS between 2016 – 2020



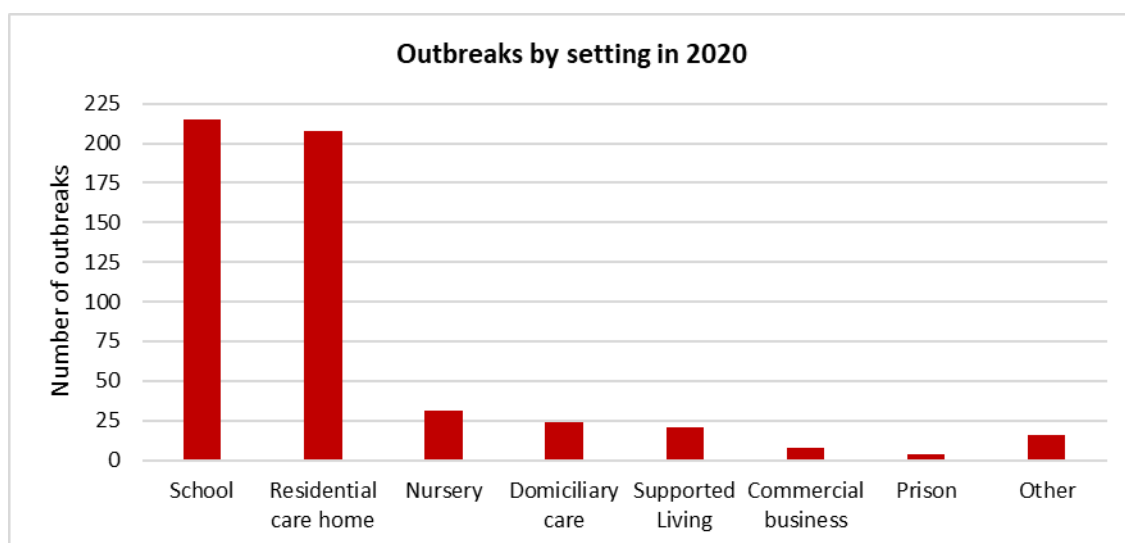
All pathogens have seen a decline in reported cases across SRS during 2020. The reasons for this are likely to be the same as those previously discussed for Campylobacter. Other relevant factors include the significantly reduced opportunity for person-to-person transmission during the 'lockdown' periods in 2020 (particularly for Giardia and Cryptosporidium), and the closure of venues such as swimming pools and animal petting farms (a common exposure source for Cryptosporidium)..

There is a continued trend in the increase of certain pathogens since the introduction of molecular testing methods in the laboratory. Where Salmonella was generally the most common pathogen after Campylobacter, this has now been surpassed by Giardia, which is now the second most common across all three local authorities.

Outbreaks

In addition to the investigation of sporadic cases of food poisoning in 2019, a total of 527 outbreaks were identified and investigated by the Communicable Disease Service, compared with 85 in 2019 and 55 in 2018. This significant increase in case numbers for 2020 can be attributed to the Covid-19 pandemic, with 95% of cases being confirmed SARS-CoV2. None of the remaining 5% were attributed to food poisoning.

Graph: Outbreaks in 2020 across the region



Unsurprisingly the sectors reporting the most significant number of outbreaks were education and care, with schools reporting 215 (41%) outbreaks and care homes reporting 208 (39%). Other settings reporting clusters of cases included a youth hostel, homeless centres, day centres, dental surgery, social club, linked residential addresses and a hen party.

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 2021/22.

Further details of projects and health promotion work can be found in the Communicable Disease and Health Promotion Plan 2021/22.

6.1.9 Feed/Food Safety Incidents

There were two Food Alerts for Action received from the Food Standards Agency for Cardiff. One alert related the notification of meat on the market from an unapproved establishment, and the other related to black eyed peas contaminated with the pesticide Chlorpyrifos which exceeded MRL levels and needed to be withdrawn from the market.

There were no feed incidents during the last year.

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 2021/22.

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 2020/21 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 at the time had caused the suspension of inspections, the closure of food businesses and the re-purposing of staff to Test, Trace and Protect.

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. Engagement with the Chartered Institute of Environmental Health and tertiary education establishments has resulted in the offer of student places within the Service which is hoped to address this issue in the long term. The Service is continuing with a recruitment exercise to fill these vacant posts. The service is 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. This process was further adapted during national lockdown to apply to all food businesses when officers undertook telephone questionnaires with businesses in order to ascertain processes and practices. This information enabled officers to make a risk assessment to determine whether a physical inspection was required.

The shortfall of inspections carried out last financial year will impact the required programme for the forthcoming year. The overdue inspections will therefore become priority for inspection before the commencement of the identified programme.

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 2021/22.

Food Safety

- 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.

- Prioritise inspections in accordance with the Food Standards Agency Recovery Plan.
- Bid for any grant funding that maybe available in order to improve standards in poorly performing businesses.
- Engage with education establishments to try to address the recruitment issues by offering student placements.
- Establish arrangements for 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 and implement a workforce development plan to ensure ability to meet goals and secure resilience of service.
- Develop a recruitment and retention policy to attempt to address current vacancy issues.
- Ensure that electronic records are updated accurately providing the necessary training where necessary.

Food Standards

- Ensure all unverified premises are contacted and risk assessed as appropriate.
- Continue to support development of Food Hygiene officers in undertaking food standards inspections in accordance with new working arrangements.
- Continue to ensure all food premises are risk rated in accordance with the Food Law Code of Practice
- Ensure all food qualified officers are kept up to date with changes in legislation via a combination of internal and external training courses and workshops.
- Continue the process of registering feed businesses and share intelligence with other authorities about the types of businesses supplying the feed chain especially those supplying co-products.
- Increase the number of competent level one feed officers within the service to help deal with the increasing number of feed businesses.
- Encourage officers to become food and/or feed qualified
- Ensure database is up to date and accurate.

Feed Hygiene

- Work with the Wales Feed Group to standardise policies and procedures.
- Continue to implement agreed actions arising from the February 2020 FSA Feed audit.
- Ensure all feed officers are kept up to date with changes in legislation through training courses and monitoring.
- 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.
- To identify new feed businesses through self-assessment questionnaires and intelligence sharing.
- To review and update as necessary the register of feed businesses.
- Ensure database is up to date and accurate.

Communicable Disease

- To review the CD procedures with reference to the changes to molecular diagnostic testing.

Appendices

- A. [Food Safety Sampling Plan](#)
- B. [Food Standards Sampling Plan](#)
- C. National Feed Enforcement Priorities 2021/22
- D. Corporate Priorities of partner authorities
- E. SRS vision, priorities and outcomes

Appendix A - Food Safety Sampling Plan 2021/22

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		Sept- March Mondays & Tuesdays	60 Cardiff, 30 Vale and 30 Bridgend	Approx 4	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
Imported Foods		Sept to March unknown	Cardiff Airport	Approx 4	Dependent on food.	Commercial

Appendix B - Food Standards Sampling Plan 2021-22

Q	Food Matrix	Analysis	Target Number	Cost per sample (excl vat)	Total Cost (excl vat)
1	Indian Takeaways	Allergens – analysis to determine presence of milk	30 (10 GG in Q1 and 20 SRS to be taken throughout year)	£96	£2880
2	Kebabs	Allergens – analysis to determine presence of milk	10 (GG)	£96	£960
3	Vegan claims. With the increased number of consumers embarking on a vegan diet, description of pre packed foods from catering establishments	Casein (Dairy)	20 (10 GG and 10 SRS)	£96	£1920
4	Left Blank to accommodate FSA funded project TBC				
All year	Retail Butcher Survey	Lean mince – fat and collagen analysis to determine compliance with compositional standards Burgers/sausages made on site – meat content and level of SO2 Where problems identified during inspection - follow up sampling to check whether correct allergen	Approx.35 Approx. 35 Approx. 20	£88 £197 £96 per allergen	£3080 £6895 £1920

Q	Food Matrix	Analysis	Target Number	Cost per sample (excl vat)	Total Cost (excl vat)
		information is being given			
All year	Complaint sampling Follow up formal sampling	As required	As required		

Appendix C – National Feed Enforcement Priorities 2020-21



National Enforcement Priorities

**Feed law enforcement and food hygiene
law enforcement at primary production**

April 2021

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Summary

This publication aims to guide local authority (LA) enforcement officers in England 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.

It will also be of interest to the feed industry and those responsible for food hygiene at primary production.

Legal status

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

Who is this publication for?

This document is for:

- local authority enforcement officers

It will also be of interest to feed business operators and food business operators at the level of primary production. Please note however that some links are only available to local authority enforcement officers.

Expiry or review date

This document will be reviewed before March 2022.

Main points

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

- National Enforcement Priorities for England, in respect of animal feed and food hygiene at the level of primary production
- expectations of LAs to implement, where relevant, these priorities as part of their intervention programme
- National Targeted Monitoring Strategy (NTMS) for England

Introduction

The objectives of the priorities are to:

- drive an intelligence led approach to official controls, focusing resources on higher-risk 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 on business 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 [approach to ensure food is safe and what it says it is](#)

The priorities:

- have been informed by the Strategic Animal Feed Threat Assessment 2019 (AFTA 2019)
- have been developed in consultation with feed industry and LA representatives; National Trading Standards ([NTS](#)); 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 [Food Law Code of Practice](#) for the prioritisation of interventions in food businesses operating at the level of primary production

National Priorities 2021/22

Animal Feed and Food Hygiene at Primary Production Priorities

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

Priority 1: Effective information sharing, communication and exchange of intelligence to support delivery of official feed and food hygiene controls

Animal Feed Priorities

Priority 2: Verification of effective feed safety management systems at businesses supplying former foodstuffs or co-products

Priority 3: Verification of effective implementation and maintenance of permanent written procedures based on HACCP principles

Priority 4: Verification of the accuracy of feed labelling particulars

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

Food Hygiene at Primary Production Priorities

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

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

Animal Feed and Food Hygiene at Primary Production Priorities

Priority 1: Effective information sharing, communication and exchange of intelligence to support delivery of official feed and food hygiene controls

Gathering and exchange of information, data and intelligence between Competent Authorities, central government departments and industry is a key element to an effective risk-based system of official feed and food controls.

LAs are expected to give priority to ensuring effective information sharing, communication and exchange of intelligence to support official feed and food control delivery by:

- a) proactively using the recognised trading standards national intelligence databases ([IDB](#) and Memex) to record intelligence, share with, and report to, the [National Food Crime Unit](#) all intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases
- b) notifying incidents to the FSA incidents team in accordance with the relevant Feed or Food Law Code of Practice. Incidents can be reported using the online service [Report a food or feed safety incident](#) or where this is not possible to contact the Incidents Team email foodincidents@food.gov.uk Tel: 020 7276 8448
- c) in relation to earned recognition, sharing details of non-compliance via the [exception reporting mechanism](#)
- d) ensuring regular liaison with LAs in their area responsible for keeping registers of food business operators (FBOs) under Article 6(2) of [Retained EU Regulation 852/2004](#) on food hygiene

Additionally, in relation to animal feed

- e) liaising, as appropriate, with inland authorities and proactively sharing information and intelligence in accordance with the Association of Chief Trading Standards Officers (ACTSO) guidance on [inland referrals](#)
- f) acknowledging and responding, in a timely manner, to authorities, when matters are referred inland, to confirm action taken, providing as much supporting information as possible
- g) liaising with the LA responsible for the nearest large point of entry for feed, or other appropriate point of contact, to use their expertise and co-operation to assist in implementing a proportionate system of official controls
- h) proactively implementing the feed hygiene Memorandum of Understanding ([MoU](#)) between ACTSO (on behalf of LAs), the Veterinary Medicines Agency ([VMD](#)) and the Animal Plant and Health Agency ([APHA](#)), which supports an intelligence led, risk-

based approach to enforcement, prevents duplication of work and aids effective use of resources

Animal Feed Priorities

Priority 2: Verification of effective feed safety management systems at businesses supplying former foodstuffs or co-products

Every year in the UK, around [660,000 tonnes of former foodstuffs are processed as animal feed, worth £110 million](#).

LAs are expected to give priority to the verification of effective feed safety management systems at businesses supplying former foodstuffs or co-products by ensuring interventions include the examination of documented feed safety management systems (HACCP plans where they are used)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 being in place with 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 of former foodstuffs to feed and co-products are all registered as feed businesses

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 [toolkits](#) to support local authority officers in relation to businesses supplying former foodstuffs and co-products

¹ Recognising that 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.

Priority 3: Verification of effective implementation and maintenance of permanent written procedures based on HACCP principles

LAs are expected to give priority to verifying appropriate implementation and maintenance of permanent written procedures based on HACCP principles by ensuring Feed Business Operators (FeBOs) understand legal requirements, are implementing, maintaining and reviewing as appropriate, their feed safety management systems, having regard to the nature, size and scale of the business².

This should include a focus on the following:

- a) examination of written feed safety management systems
- b) 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 risk-assessed incorrectly
- c) that Critical Control Points (CCP) are correctly identified, properly defined and controlled. Where hazards have been identified as a CCP but are adequately controlled by a prerequisite procedure, the necessity for a CCP should be raised with the FeBE. (NB. In relation to raw pet food this should include safe sourcing.)
- d) 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 [additives](#) with maximum permitted levels for any target species)
- e) appropriate sampling programmes at the feed business are in place to verify compliance with maximum levels of undesirable substances in feed materials and additives. Checks should include an examination of analytical results and consideration of whether appropriate action has been taken
- f) scrutinising traceability systems to ensure that products not intended for feed use are not diverted into the feed/food chain

² Recognising that 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.

Priority 4: Verification of the accuracy of feed labelling particulars

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. The presence and accuracy of labelling information is critical in ensuring

- feed is provided to the correct species and their sub-category (e.g. weaned piglets), age of animal and in quantities that would not adversely affect human and/or animal health
- traceability to aid prompt recall and withdrawal of affected products in the event of a feed safety incident

LAs are expected to give priority to:

- a) verifying the accuracy of claims as set out in Article 13 of [Retained EU Regulation 767/2009](#) on the placing on the market and use of feed
- b) ensuring labelling and presentation of feed does not mislead the user, particularly in respect of the country of origin, quality and method of manufacture or production e.g. organic and non-Genetically Modified
- c) additives present in feed are authorised (included in the register of feed additives) in line with [Retained EU Regulation 1831/2003](#) on additives for use in animal nutrition

Priority 5: 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, 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](#)

Food Hygiene Primary Production Priorities

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

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.

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 vegetables
 - i) normally eaten raw, for example lettuce, micro leaves, baby leaves, watercress, spinach and herbs
 - 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

National Targeted Monitoring Strategy (NTMS) for Animal Feed

The NTMS approach for 2021/22 in relation to R13 and R14 farms has been informed by:

- a) the findings of the AFTA 2019, in respect of feed business establishments
- b) the level of current compliance of the feed business establishment
- c) whether the feed establishment benefits from Type 1 or Type 2 [Earned Recognition](#)

LAs are expected to examine, where applicable:

- a) any former foodstuffs/co-products being used for feed:
 - i) is not contaminated
 - ii) does not contain prohibited substances³
 - iii) is being sourced from a registered feed business establishment

- b) for compliance with the record keeping requirements detailed in Annexes I and II of [Retained EU Regulation 183/2005](#) laying down requirements for feed hygiene

Table 1: NTMS Intervention Type and Frequency

Feed Business Establishment Type	Level of current compliance		
	Satisfactory - Not a member of an FSA Approved Assurance Scheme	Broad Compliance - Not a member of an FSA Approved Assurance Scheme Type 2	At least satisfactory compliance – A member of an FSA Approved Assurance Scheme Type 1
	Frequency of inspection or audit		
R13	0.75%	0.5%	0.25%
R14	0.75%	0.5%	0.25%

³ Annex III of [Retained EU Regulation 767/2009](#) on the placing on the market and use of feed

Guidance

Animal Feed

[FSA webpage](#) on animal feed legislation

[NTS Guidance](#) on Co-producers and Suppliers of Surplus Food including inspection form and data collection form

[FSA guidance](#) on the presence of food grade packaging material in feed

[PAS 222:2011](#) Prerequisite programmes for food safety in the manufacture of food and feed for animals

[APHA Guidance](#) on former foodstuffs eligible for feeding

[FSA guidance](#) on HACCP-related requirements of the Feed Hygiene Regulation for farmers

[Advisory Committee on Animal Feeding Stuffs \(ACAF\)](#) review of [on-farm feeding practices](#) - updated recommendations on identifying hazards and minimising risks

[Industry Codes of Practice](#) for on-farm feeding, which applies to farmers and covers all aspects of on-farm feeding, including on-farm mixing

[Good Practices for the feed industry](#) implementing the Codex Alimentarius Code of Practice on good animal feeding

[Defra Code of Practice](#) for the control of salmonella during the production, storage and transport of compound feeds, premixtures, feed materials and feed additives

[Codex Alimentarius Standards](#) relevant to feed

[EC Community Guides](#) to good practice developed in accordance with Article 22 of [Regulation \(EC\) No 1831/2003](#) laying down requirements for feed hygiene

[EU Code of Good Labelling Practice](#) for compound feed for food producing animals

[FEDIAF Code of Good Labelling Practice](#) for pet food

[European Feed Manufacturers \(EMFC\) guide](#) published by the European Feed Manufacturers' Federation (FEFAC) on good practices for the industrial manufacturing of compound feed and premixtures for food producing animals

[EU Community Guide](#) to good practice for feed additive and premixture operators

[EU Guide](#) to good practice for the industrial manufacture of safe feed materials

[EU Guide](#) to good hygiene practices for the collection, storage, trading and transport of cereals, oilseeds, protein crops, other plant products and products derived thereof

[EU Guide](#) on the manufacturing of safe feed materials from starch processing

[EU Guide](#) on the manufacturing of safe feed materials from oilseed crushing and vegetable oil refining

[EU Guide](#) on the manufacturing of safe feed materials from biodiesel processing

[EU Guide Salmonella factsheet](#) and [Salmonella checklist](#)

Industry Standards

Red Tractor Assurance [Scheme Standards](#)

AIC Feed Material Assurance Scheme Standards ([FEMAS](#))

AIC Universal Feed Assurance Scheme ([UFAS](#))

AIC Trade Assurance Scheme for Combinable Crops ([TASCC](#))

[BRC Voluntary Module 9](#) – Management of Food Materials for Animal Feed

Imported Feed

[ACTSO Guidance](#) on sharing information and intelligence to support delivery of imported feed controls

[Border Control Posts](#) applicable to imports of animal feed

Food Hygiene Primary Production

[FSA Guidance](#) Private Water Supply

[FSA Enforcement Guidance](#) for Fresh Fruit and Vegetable Production

[Health Protection Agency Guidelines](#) for Monitoring Microbiological Safety of Fresh Produce

[AHDB Horticulture Fact Sheet](#) – Monitoring Microbial Food Safety of Fresh Produce

[FSA Guidance](#) on Food Traceability, Withdrawals and Recalls within the UK Food Industry

[EU and National Guides](#) to Good Hygiene Practice

[EU Commission Guidance](#) document on addressing microbiological risks in fresh fruit and vegetables at primary production through good hygiene

[EU Register](#) of National Guides to Good Hygiene Practice



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Appendix D – Corporate Priorities and outcomes of partner local authorities

Bridgend County Borough Council



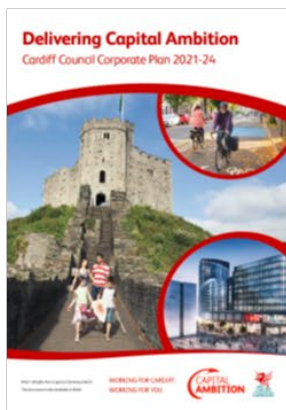
Priorities

- Supporting a successful sustainable economy
- Helping people and communities to be more healthy and resilient
- Smarter use of resources

Outcomes/Aims

- Improve learner outcomes
- Growth and prosperity
- Developing and enhancing community support and services
- Build resilient communities
- Better health and well-being
- Transforming the Council's estate
- Areas of corporate change
- Decarbonisation and environmental sustainability

City of Cardiff Council



Priorities

- 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
- Managing the Covid-19 pandemic

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
- Managing the Covid-19 pandemic

Vale of Glamorgan Council



Priorities

- 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

Outcomes/Aims


- 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


Improving health and wellbeing

 The food chain is safe and free from risks


 Risks in the workplace are managed properly

 Noise and air emissions are controlled


 A safe trading environment is maintained


 Licensed premises operate responsibly

 The quality of private rented property is improved


 Infectious disease is controlled and prevented

Protecting the environment


 The environment is protected from harmful emissions to land, air and water


 People will use energy efficient buildings and products


 Communities are protected from nuisance and are safer


 Animals are treated humanely


Safeguarding the vulnerable

 Children are protected from harmful substances and products

 Older and vulnerable people are protected from rogue traders and scams


 Illegal money lending activities are prevented


 Taxi provision is safe and fair


 Vulnerable people are not subject to exploitation, slavery or trafficking

Supporting the local economy


 A fair trading environment is maintained


 Informed and confident consumers


 Improved business practices and operation


 Accessible services responsive to business needs

Maximising the use of resources

 SRS operates effectively and efficiently across all 3 areas

 Public and stakeholders can access our services

 Income generation underpins sustainable service delivery

 Staff are effective in their roles

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.

