

Report on the Audit of Official Controls on Feed of Non-Animal Origin (FNAO) and Feed Establishments, including Primary Producers

Gloucestershire County Council
23-24 October 2013



Foreword

Audits of local authorities' feed and food law enforcement services are part of the Food Standards Agency's arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food and feed law relating to food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of local authorities. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services. The Agency's website contains enforcement activity data for all UK local authorities and can be found at:

www.food.gov.uk/enforcement/auditandmonitoring.

This programme of focused audits in England has been specifically developed to address two of the priorities identified in the Food Standard Agency's Strategy for 2010-2015 in meeting the outcomes that feed meets the legislative requirements for animal consumption and is safe to enter the human food chain and that regulation is effective, risk-based and proportionate. The strategic priority is to ensure risk-based, targeted checks at inland feed establishments and effective local authority monitoring throughout the feed chain. The audits will also provide an opportunity for the Agency to establish the level of improvement in the delivery of official controls being implemented by local authorities (LAs) following the FVO Mission to the United Kingdom on animal feed controls which took place from 16-26 June 2009 and the subsequent follow-up visit to check on progress in November 2011. The report entitled 'The Implementation of Measures Concerning Official Controls on Feed Legislation' is available from the Europa website at:

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=2335.

Agency audits assess LAs conformance against the Feed and Food Law Enforcement Standard ("The Standard"), which was published by the Agency as part of the Framework Agreement on Official Feed and Food Controls by Local Authorities (amended April 2010) and is available on the Agency's website at:

www.food.gov.uk/enforcement/auditandmonitoring.

The programme examined local authority (LA) systems and procedures for control of feed at inland authorities, in 10 geographically representative LAs in England. The audits were confined to feed of non-animal origin (FNAO).

It should be acknowledged that there will be considerable diversity in the way and manner in which LAs may provide their feed enforcement services reflecting local needs and priorities.

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that local authorities are providing an effective feed law enforcement service. The scheme also provides the

opportunity to identify and disseminate good practice and provide information to inform Agency policy on feeding stuffs. Parallel local authority audit schemes are implemented by the Agency's offices in all devolved countries comprising the UK.

For assistance, a glossary of technical terms used within the audit report can be found at Annex C.

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1.0 Introduction

- 1.1 This report records the results of an audit at Gloucestershire County Council with regard to feed law enforcement, under relevant headings of the Food Standards Agency Feed and Food Law Enforcement Standard. The audit focused on the Authority's arrangements for inland controls of feed of non-animal origin. The report has been made publicly available on the Agency's website at: www.food.gov.uk/enforcement/auditandmonitoring/auditreports Hard copies are available from the Food Standards Agency's Operations Assurance Division at Aviation House, 125 Kingsway, London WC2B 6NH, Tel: 020 7276 8428.

Reason for the Audit

- 1.2 The power to set standards, monitor and audit local authority feed and food law enforcement services was conferred on the Food Standards Agency by the Food Standards Act 1999 and the Official Feed and Food Controls (England) Regulations 2009. This audit of Gloucestershire County Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 1.3 Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law includes a requirement for competent authorities to carry out internal audits or to have external audits carried out. The purpose of these audits is to verify whether official controls relating to feed and food law are effectively implemented. To fulfil this requirement, the Food Standards Agency, as the central competent authority for feed and food law in the UK has established external audit arrangements. In developing these, the Agency has taken account of the European Commission guidance on how such audits should be conducted.¹
- 1.4 The Authority was included in the Food Standards Agency's programme of audits of local authority feed law enforcement services, as it had not been audited in the past by the Agency and was representative of a geographical mix of 10 feed law enforcement LAs across England.

¹ Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No. 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules (2006/677/EC)

Scope of the Audit

- 1.5 The audit examined Gloucestershire County Council's systems and procedures for the control of feed of non-animal origin (FNAO).
- 1.6 The audit scope included the assessment of local arrangements for service planning, delivery and review, provision and adequacy of officer training, authorisations, implementation and effectiveness of feed control activities, including inspection, sampling and enforcement. Maintenance and management of appropriate records in relation to feed and internal service monitoring arrangements were also covered.
- 1.7 The on-site element of the audit took place at the Authority's offices at Hillfield House, Denmark Road, Gloucester on 23 - 24 October 2013. The audit included a reality check at a feed establishment to assess the effectiveness of official controls implemented by the Service and more specifically, the checks carried out by the Service's officers to verify compliance with feed law requirements.

Background

- 1.8 Gloucestershire is in the south west region of England close to the Welsh border. The county which is largely rural covers an area of over 1,000 square miles and has a population of approximately 580,000. The City of Gloucester and Borough of Cheltenham Spa are the main centres of population. The local economy is mixed, however there are a large number of farms and an estimated 12,000 businesses involved in the production or supply of food or drink.
- 1.9 Feed law enforcement was part of the responsibilities of the Trading Standards Service responsible to the Chief Fire Officer and Operations Director who reported to the Chief Operating Officer who in turn reported directly to the Chief Executive. The Council made key decisions through a Cabinet of Elected Members. Trading Standards was the responsibility of the Cabinet Member for Fire Planning and Infrastructure.
- 1.10 The profile of Gloucestershire County Council's feed businesses according to figures submitted to the Agency for 2010/11 was as follows:

Type of Feed Premises	Number
Arable Farms	29
Livestock Farms	3,286
Manufacturers	5
Food businesses selling co-products/surplus food	50
Importers	1
Distributors/Transporters	20
Stores	1
Retailers	15
Total Number of Feed Premises	3,407

2.0 Executive Summary

2.1 Gloucestershire County Council was selected for audit as it had not been previously audited by the Agency. Auditors were informed and acknowledged that in recent years the Authority had been subject to financial pressures which had resulted in a reduction in Trading Standards staffing from 48 to 24.

2.2 Key areas for improvement:

Service planning: The Authority needed to develop a Service Plan for feed law enforcement in accordance with the Service Planning Guidance in the Framework Agreement. This should include a comparison of the resources required to carry out the full range of statutory feed law enforcement activities against the resources available to the Authority. The Plan should be reviewed at least once a year and any variance addressed.

Review and updating of documented policies and procedures: The Authority needed to ensure documented policies and key procedures required by the Framework Agreement such as a feed sampling policy, a complaints policy and procedures for enforcement notices, maintenance of the database and responding to alerts were controlled and regularly updated.

Officer authorisations and training: Authorisations required review to ensure they contained all relevant feed legislation. All officers need to attain the minimum number of hours of continuing professional development (CPD) as required in the Feed Law Enforcement Code of Practice (FLECP).

Feedingstuffs establishment interventions and inspections: All feeding stuffs premises should be risk rated and inspected at appropriate frequencies, as specified in the FLECP.

Internal monitoring: The Authority was undertaking some internal monitoring but needed to review and document internal monitoring procedures to reflect the monitoring activities already undertaken to verify the Service's conformance with legislation and official guidance across all areas of the Standard. Records of internal monitoring activities should be routinely maintained.

3.0 Audit Findings

3.1 Organisations and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 The strategic framework of the Authority primarily consisted of its vision and strategy. The overall vision of the Council was to use the resources available to improve the quality of life for Gloucestershire people. This was supported through three values:
- Living within our means
 - Providing the basics
 - Helping communities help themselves.
- 3.1.2 The Council Strategy “Meeting the Challenge”, launched in 2011, aimed to transform the Authority by generating £114m savings and at the same time sought to focus frontline services on protecting the most vulnerable, supporting active communities and building a sustainable county.
- 3.1.3 The strategy had identified the Trading Standards Service as one of the services the Authority should first consider to drive down costs. Savings of £880,000 had been made over a two year period and the service was focusing on enforcement issues prioritised by local demand and statutory duties.
- 3.1.4 The Authority had not developed a documented Service Plan for the delivery of feed law enforcement activities for 2013/14. Previously the Authority’s Food Service Plan had incorporated feed law enforcement activities, however no plan had been produced since 2011/12. Auditors discussed the need for the Authority to develop a Feed Service Plan in accordance with the Service Planning Guidance in the Framework Agreement to ensure that the Authority is informed of the feed law enforcement demands on the Service and the annual planned interventions to be carried out.
- 3.1.5 The Plan should include a realistic comparison of the resources required to deliver the feed law enforcement service against resources available to the Authority. A review of the Service Plan should be conducted on an annual basis and any variations from the Plan identified.
- 3.1.6 The Agency provides guidance to local authorities on current national feed enforcement priorities to enable better targeting of official control activities. Auditors were advised that these priorities had been considered in making applications for grant funding from the Agency.

Recommendation

3.1.7 The Authority should:

Develop a Service Plan for feed law enforcement in accordance with the Service Planning Guidance in the Framework Agreement, to include a comparison of the resources required to carry out the full range of statutory feed law enforcement activities against the resources available to the Authority. Ensure that the Service Plan is reviewed at least once a year and any variance is addressed in the subsequent year's arrangements.

[The Standard – 3.1, 3.2 and 3.3]

Documented Policies and Procedures

- 3.1.8 The Authority had previously documented policies for feed law enforcement activities in the Food Plan for 2011/12, however, these policies had changed and required updating and documenting.
- 3.1.9 A documented quality management system had been developed and implemented which formed part of the computerised Trading Standards Information System. The system included specific feed procedures such as inspection, sampling, maintenance of equipment and also relevant generic procedures. All procedures had issue dates and revision references. The Authority had previously undertaken regular reviews of procedures through a structured programme of internal audits. However due to pressures on resources the Authority had been unable to fully maintain internal audits.
- 3.1.10 Auditors discussed the need to ensure that policies and procedures were regularly reviewed, updated and documented to ensure consistency and to provide a sound source of guidance for staff in the delivery of feed law enforcement activities.

Recommendation

3.1.11 The Authority should:

Ensure that documented policies and procedures for the feed law enforcement service are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]

Officer Authorisations

- 3.1.12 The Authority had developed and implemented a documented procedure for the authorisation of officers for food and feed law enforcement. The Head of Service was responsible for ensuring that only staff with the necessary qualifications, competence and experience were authorised. The procedure detailed the qualifications, experience and knowledge required for authorisation. Whilst the Head of Service undertook assessments against these criteria, records of such assessments were not maintained.
- 3.1.13 Officer training needs were identified as part of a documented corporate appraisal scheme. Training record file checks found that whilst the Lead Officer was appropriately qualified, the 10 hours training based on continuing professional development (CPD) required by the Feed Law Enforcement Code of Practice (FLECP) had not been maintained. Other officers had maintained the required level of CPD but would benefit from more emphasis on feed specific training.
- 3.1.14 Authorisations required review to ensure that they were up to date and include all relevant feed law enforcement, such as the Official Feed and Food Controls (England) Regulations 2009, relevant Emergency Control Regulations and the Animal Feed Regulations 2010. Auditors advised that legislation containing specific enforcement powers should be considered by the Council's legal department to ensure that officers were appropriately authorised.

Recommendations

3.1.15 The Authority should:

- (i) Review and update current authorisations to ensure that all officers are appropriately authorised under relevant current legislation, consistent with their qualifications, training and experience. [The Standard – 5.3]
- (ii) Ensure that all authorised officers receive the training needed to deliver the work that they are involved with in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 5.4]

Facilities and Equipment

- 3.1.16 Auditors confirmed that the Service had suitable equipment available for sampling a range of feed products.
- 3.1.17 The Authority had an electronic database for the recording of feed law enforcement activities which was capable of providing information necessary for official returns.
- 3.1.18 The Service had not maintained a documented procedure to ensure that its feed premises database was accurate. The database was updated from the National Land Gazetteer, farm assurance schemes and from data supplied by District Councils. Officers input their own data which was subject to an annual check, and controls were in place for the closure of database premises. Audit checks on a selection of six feed premises taken from a commercial directory confirmed that the premises were appropriately recorded on the database or on the register of feed establishments although they had not been programmed for future interventions.

Recommendation

3.1.19 The Authority should:

Review, maintain and implement a procedure to ensure that the feed premises database is accurate, reliable and up to date. [The Standard – 11.2]

Liaison with Other Organisations

- 3.1.20 The Authority had established effective liaison arrangements on animal feed matters with enforcement bodies across the region and central government. Officers regularly attended the South West Trading Standards Partnership Feed Group and also liaised electronically through a specialist group. The Authority had worked with regional partners to develop a successful bid for funding for feed work. Officers had established channels of communications with District Councils, the Animal Health and Veterinary Laboratories Agency and the Veterinary Medicines Directorate.

3.2 Feed Control Activities

Feed Establishments Interventions and Inspections

- 3.2.1 The Authority had developed and implemented a documented procedure for agriculture inspection visits and agriculture hygiene requirements.
- 3.2.2 Auditors were advised that the Service did not carry out routine inspections of feed premises other than those funded by the Agency and that risk rating of feed premises was no longer undertaken. The Authority had successfully applied for grant funding from the Agency to carry out 40 feed premises inspections in 2013/14.
- 3.2.3 File checks on five inspection records found that where the Agency's inspection aides-memoire had been used there were sufficient details recorded of inspections and officer observations. However the Service had also used other inspection templates for feed inspections and in these instances there was insufficient information to determine how compliance had been assessed.
- 3.2.4 Comprehensive records are essential for informing enforcement decisions, providing information for future inspections, and to provide the foundation of internal monitoring activities. The benefit of the consistent use of an inspection aide-memoire/report form was discussed and auditors were advised that the Authority had already decided to consistently use the Agency's templates in future.

Recommendations

3.2.5 The Authority should:

- (i) Ensure that feeding stuffs premises are risk rated and inspected at a frequency which is not less than that determined under the relevant rating system in accordance with legislation, the Feed Law Enforcement Code of Practice, and centrally issued guidance. [The Standard - 7.1]
- (ii) Ensure that all observations and/or data obtained in the course of an inspection are noted in sufficient detail to provide an adequate record of the assessment and determination of business compliance with relevant feed legislation. [The Standard - 16.1]

Verification Visit to a Feed Premises

- 3.2.6 During the audit, a verification visit was undertaken to a feeding stuffs establishment with an officer from the Authority, who had carried out the last feed inspection of the premises. The main objective of the visit was to assess the effectiveness of the Authority's assessment of feed business compliance with feed law requirements. The officer was familiar with the operations carried out at the establishment, able to demonstrate a high level of knowledge of feed law and had effectively assessed compliance with feed law requirements.

Feed Inspection and Sampling

- 3.2.7 The Service had no documented feed sampling policy, however, auditors were advised that the Service did not take routine feed samples unless specifically funded by the Agency. Documented procedures for food and feed sampling and the storage and disposal of samples had been developed and implemented. An appropriate Agricultural Analyst had been appointed.
- 3.2.8 The Authority had, as part of a regional bid, successfully applied for a grant from the Food Standards Agency for 2013/14 and planned to take thirty feed samples. In preparing the funding application the National Enforcement Priorities for Feed Authorities had been taken into account.
- 3.2.9 Five records of feed sampling activities were examined and these confirmed that samples had been taken by a suitably authorised officer. All samples had been found to be satisfactory and had been dealt with in accordance with the FLECP.

Recommendation

3.2.10 The Authority should:

Review, maintain and implement a sampling policy in accordance with the Feed Law Enforcement Code of Practice and centrally issued guidance.
[The Standard - 12.4]

Enforcement

- 3.2.11 The Authority had developed and implemented an enforcement policy which had been appropriately approved. The policy had been developed to provide a framework to ensure the Service worked in an equitable, practical and consistent manner. The policy had due regard to the principles of good regulation including the Legislative and

Regulatory Reform Act 2006, the Regulators' Compliance Code and the Code for Crown Prosecutors.

- 3.2.12 Documented generic procedures had been developed for investigations, seizure and forfeiture of goods, cautioning of offenders and prosecutions. However there were no documented procedures for the issue of notices.
- 3.2.13 The Authority had not issued any notices, simple cautions or undertaken any prosecutions in relation to feed law enforcement in the last two years.

Recommendation

3.2.14 The Authority should:

Review, maintain and implement documented procedures for the full range of enforcement actions in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard – 15.2]

Feed Complaints, Primary Authority Scheme and Home Authority Principle

- 3.2.15 Complaints were received via the Citizens Advice Consumer Service, telephone, email, letter and personal callers, however, auditors were advised that feed complaint levels were relatively low. The Authority had no documented feed complaints policy. A procedure for "Agriculture Complaints" dated 18 January 2011 was no longer in use and the Authority had developed a draft "Duty Officer" procedure which outlined intelligence led approach to dealing with complaints and referrals generally.
- 3.2.16 Checks on three case files confirmed that appropriate action had been undertaken in two cases. However in one case a complaint regarding the appearance of feed had resulted in the complainant being advised to take the issue up with the supplier. It was unclear if this was appropriate action.
- 3.2.17 The Authority supported the Home Authority Principle and Primary Authority scheme and acted as Home Authority for one feed based business.

Recommendation

3.2.18 The Authority should:

Review, maintain and implement a documented policy in relation to feed complaints in accordance with the Feed Law Enforcement Code of Practice and official guidance.
[The Standard – 8.1]

Feed Safety Incidents

3.2.19 The Authority had a computer system capable of receiving feed alerts but had not developed, implemented and maintained a documented procedure for initiating and responding to alerts. Responses to alerts were recorded on the computerised system and out of hours response arrangements were in place.

Recommendation

3.2.20 The Authority should:

Review, maintain and implement a documented procedure in relation to feed alerts in accordance with the Feed Law Enforcement Code of Practice and official guidance.
[The Standard – 14.1]

Advice to Business

3.2.21 The Authority offered proactive and reactive business advice which was primarily provided through its website, on request, on inspection, and as a result of sampling. The Authority had not recently instigated any feed specific business advice initiatives.

3.3 Internal Monitoring and Third Party or Peer Review

Internal Monitoring

- 3.3.1 The Service had not maintained a documented internal monitoring procedure for feed law enforcement activities in accordance with Regulation (EC) No. 882/2004 (Official Feed and Food Controls) and the FLECP.
- 3.3.2 Individual performance was generally monitored through the corporate appraisal system. Quantitative monitoring of feed law enforcement activities was facilitated through Tasking Team monthly reports, monthly team meetings and one to one meetings with managers. However, there were few documented records of the monitoring undertaken. Qualitative monitoring included checking of all inspection records and letters arising from grant funded work, shadowing of officers and a reduced level of auditing of the quality management system.

Recommendation

3.3.3 The Authority should:

Review and implement a documented internal monitoring procedure to include quantitative and qualitative monitoring of feed law enforcement activities. The procedure should reflect the monitoring activities already undertaken and should be aimed at verifying the Service's conformance with relevant legislation, official guidance, the Standard and its own policies and procedures. Records of monitoring checks should be maintained. [The Standard - 19.1, 19.2 and 19.3]

Records

- 3.3.4 Records of feed law enforcement activities were maintained electronically and in paper files. Whilst the quality of records of feed premises interventions was variable, records such as complaints, referrals and samples were generally up to date, accurate, and easily retrievable.

Third Party or Peer Review

- 3.3.5 The Authority had participated in a South West Regional Trading Standards Partnership inter-authority audit programme in 2011. The audit focus was on the food and feed law enforcement Service's arrangements for database management, high risk premises

inspections and internal monitoring. The audit report set out seven recommendations to which the Service had responded by producing an action plan. However evidence to demonstrate these actions had been undertaken was incomplete.

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ANNEX A Action Plan for Gloucestershire County Council

Audit date: 23-24 October 2013

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.1.7 Develop a Service Plan for feed law enforcement in accordance with the Service Planning Guidance in the Framework Agreement, to include a comparison of the resources required to carry out the full range of statutory feed law enforcement activities against the resources available to the Authority. Ensure that the Service Plan is reviewed at least once a year and any variance is addressed in the subsequent year's arrangements. [The Standard – 3.1, 3.2 and 3.3]</p>	<p>31/05/14</p>	<p>Complete Feed Service Plan for 2014/15, include and link in with Food Service Plan.</p> <p>Comparison of resources will be looked into where possible.</p> <p>Following restructuring looking to ensure plan is completed every year.</p>	<p>Started discussions on strategic plans affecting Service Plan.</p> <p>Reviewing current surveys and projects and will be using the results as the basis for next year's Service Plan.</p>
<p>3.1.11 Ensure that documented policies and procedures for the feed law enforcement service are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]</p>	<p>Initial review by 31/05/14</p>	<p>Set out to review policies and procedures where needed.</p> <p>Any improvements in our tactical tasking approach and structure to be included in reviews.</p> <p>Continual review taking into account guidance changes.</p>	<p>Reviewing is already being undertaken.</p> <p>Review will include any confirmed changes in the new Feed Law Enforcement Code of Practice (CoP) and guidance.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.15(i) Review and update current authorisations to ensure that all officers are appropriately authorised under relevant current legislation, consistent with their qualifications, training and experience. [The Standard – 5.3]	31/05/14	Review taking into account any legal and regional advice over the authorisation which is required.	Confirm previous legal advice given. Reviewing and including additions to warrants of new legislation eg Animal By Products Regulations 2013.
3.1.15(ii) Ensure that all authorised officers receive the training needed to deliver the work that they are involved with in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 5.4]	31/05/14	Reconsider who should be identified as the “lead officer” and whether the role should be separate from the manager responsible for feed related work.	Confirmed that all authorised officers who carry out feed work are qualified and have received sufficient training in accordance with CoP.
3.1.19 Develop, maintain and implement a procedure to ensure that the feed premises database is accurate, reliable and up to date. [The Standard – 11.2]	31/05/14	Update procedure for officers in maintaining and improving accuracy of database	Already have developed a database with is accurate and reliable.
	31/05/14	Review relevance and accuracy of other methods of information recording.	Updating database with information as it is obtained.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.2.5(i) Ensure that feeding stuffs premises are risk rated and inspected at a frequency which is not less than that determined under the relevant rating system in accordance with legislation, the Feed Law Enforcement Code of Practice, and centrally issued guidance. [The Standard - 7.1]	31/05/14	In preparation for the allocation of the FSA funding allocation for 2014/15 the Authority completed a desk-top-model exercise of all their feed related premises. This was then used to create a profile and inspection programme which will be progressed during 2014/15.	Reviewing of projects and surveys and will use the results as basis for next year's Service Strategic Plan.
3.2.5(ii) Ensure that all observations and/or data obtained in the course of an inspection are noted in sufficient detail to provide an adequate record of the assessment and determination of business compliance with relevant feed legislation. [The Standard - 16.1]	31/05/14	Continuous review of future inspections and observations to ensure sufficient detail is recorded.	Checked through records from 2012 which have identified all have provided sufficient detail to determine business compliance.
3.2.10 Maintain and implement a sampling policy in accordance with the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard - 12.4]	Link with new FSA projects in 2014 31/05/14	Review policy over contract agreement laid down with FSA sampling applications. Continuously review and update Quality Procedure (QP) 6.2 on sampling, linking with new intelligence led tasking process and changes in service structure.	Assessing current documents used for 2013/14 FSA sampling project. Review of QP started.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.2.14 Maintain and implement documented procedures for the full range of enforcement actions in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard – 15.2]	31/05/14 As required	Continuously review and update various QP in relation to enforcement actions, linking with new intelligence led tasking process and changes in service structure. Assess any new and amended prosecution and enforcement criminal procedure rules and include changes in our QP.	Review of QP started.
3.2.18 Maintain and implement documented policy in relation to feed complaints in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard – 8.1]	31/05/14	Continuously review and update QP 5.5 complaints, linking with new intelligence led tasking process and changes in service structure.	Review of QP started.
3.2.20 Maintain and implement documented procedure in relation to feed alerts in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard – 14.1]	31/05/14	Continuously review and update current Work Instruction WI 1.6 Food Safety Incidents procedure.	Procedure currently in operation and have recent example of FSA alert responded to and actioned.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.3.3 Develop and implement a documented internal monitoring procedure to include quantitative and qualitative monitoring of feed law enforcement activities. The procedure should reflect the monitoring activities already undertaken and should be aimed at verifying the Service's conformance with relevant legislation, official guidance, the Standard and its own policies and procedures. Records of monitoring checks should be maintained. [The Standard - 19.1, 19.2 and 19.3]</p>	<p>31/05/14</p>	<p>Continuously review and update QP 1 Quality Management procedures in relation to internal monitoring, linking in with new intelligence led tasking process and changes in service structure.</p>	<p>Review of QP started.</p>

ANNEX B Audit Approach/Methodology

The audit was conducted using a variety of approaches and methodologies as follows:

(1) Examination of LA policies and procedures.

The following relevant LA policies, procedures and linked documents were examined before and during the audit:

- Gloucestershire County Council Plan
- Food and Feed Service Plan 2011/12
- Council Minutes and Reports
- Enforcement Policy
- Quality System Procedures.

(2) File reviews – the following LA file records were reviewed during the audit:

- Evidence of authorisations and qualifications
- Liaison records
- Training records
- Feed establishments records
- Feed inspection and sampling records
- Feed complaint/referral/service request records.

(3) Officer interviews – the following officers were interviewed:

- Audit Liaison Officer
- Lead Officer Feed
- Enforcement Officer.

Opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.

(4) On-site verification check:

A verification visit was made with the Authority's officers to a local food business. The purpose of the visit was to assess the effectiveness of the officer's evaluation of the compliance of the feed business with legislative requirements.

ANNEX C Glossary

Agricultural Analyst	A person, holding the prescribed qualifications, who is formally appointed by a local authority to analyse feed samples.
Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Codes of Practice	Government Codes of Practice issued under Section 40 of the Food Safety Act 1990 as guidance to local authorities on the enforcement of food and feed legislation.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
Defra	The Department for Environment, Food and Rural Affairs. The Government Department designated as the central competent authority for products of animal origin in England.
District Council	A local authority of a smaller geographical area and situated within a County Council whose responsibilities include food hygiene enforcement.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
FNAO	Feed non-animal origin. Products that do not fall under the requirements of the veterinary control regime.
FVO	Food and Veterinary Office, part of the European Commission, based within the Directorate General for Health and Consumers.
Feed Law Enforcement Code of Practice	Government Codes of Practice issued under the Official Feed and Food Control Regulations.
Feeding stuffs	Term used in legislation on feed mixes for farm animals and pet food.
Food Examiner	A person holding the prescribed qualifications who undertakes microbiological analysis on behalf of the local authority.

Food/feed hygiene	The legal requirements covering the safety and wholesomeness of food/feed.
Food/feed standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food/feed, and materials in contact with food.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> • Food and Feed Law Enforcement Standard • Service Planning Guidance • Monitoring Scheme • Audit Scheme <p>The Standard and the Service Planning Guidance set out the Agency's expectations on the planning and delivery of food and feed law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit yearly returns via LAEMS to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p> <p>Under the Audit Scheme the Food Standards Agency will be conducting audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.</p>
Full Time Equivalents (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food and feed enforcement.
HACCP	Hazard Analysis and Critical Control Point – a food/feed safety management system used within food/feed businesses to identify points in the production process where it is critical for food/feed safety that the control measure is carried out correctly, thereby eliminating or reducing the hazard to a safe level.
Home Authority	An authority where the relevant decision making base of an enterprise is located and which has taken on the responsibility of advising that business on food and feed safety/ standards issues. Acts as the central contact point for other enforcing authorities' enquiries with regard to that company's food/feed related policies and procedures.

Informal samples	Samples that have not been taken in accordance with the appropriate sampling regulation (e.g. samples for screening purposes) and/or not sent to an accredited laboratory.
Member forum	A local authority forum at which Council Members discuss and make decisions on food law enforcement services.
Metropolitan Authority	A local authority normally associated with a large urban conurbation in which the County and District Council functions are combined.
Port Health Authority (PHA)	An authority specifically constituted for port health functions including imported food and feed control.
Primary Authority	An authority that has formed a formal partnership with a business in accordance with the Regulatory Enforcement and Sanctions Act 2008.
Public Analyst	An officer, holding the prescribed qualifications, who is formally appointed by the local authority to carry out chemical analysis of food and feed samples.
RASFF	Rapid alert system for food and feed. The European Union system for alerting port enforcement authorities of food and feed hazards.
Regulators' Compliance Code	Statutory Code to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on businesses.
Risk rating	A system that rates food/feed premises according to risk and determines how frequently those premises should be inspected. For example, high risk premises should be inspected at least every 6 months.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food/feed service to the local community.
Trading Standards	The Department within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feeding stuffs legislation.

Trading Standards
Officer (TSO)

Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feeding stuffs legislation.

Unitary Authority

A local authority in which the County and District Council functions are combined, examples being Metropolitan District/Borough Councils, and London Boroughs. A Unitary Authority's responsibilities will include food hygiene, food standards and feeding stuffs enforcement.