

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

Oldham Council
8-9 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 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 LAs 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.

Contents

1.0	Introduction	5
	Reason for the Audit	5
	Scope of the Audit	5
	Background	6
2.0	Executive Summary	8
3.0	Audit Findings	9
3.1	Organisations and Management	9
	Strategic Framework, Policy and Service Planning	9
	Documented Policies and Procedures	10
	Officer Authorisations	10
	Facilities and Equipment	11
	Liaison with Other Organisations	12
3.2	Feed Control Activities	13
	Feed Establishments Interventions and Inspections	13
	Verification Visit to a Feed Premises	14
	Feed Inspection and Sampling	14
	Enforcement	15
	Feed Complaints, Primary Authority Scheme and Home Authority Principle	16
	Feed Safety Incidents	16
	Advice to Business	16
3.3	Internal Monitoring and Third Party or Peer Review	17
	Internal Monitoring	17
	Records	17
	Third Party or Peer Review	17
ANNEX A	Action Plan for Oldham Council	19
ANNEX B	Audit Approach/Methodology	24
ANNEX C	Glossary	25

1.0 Introduction

- 1.1 This report records the results of an audit at Oldham 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 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 Oldham 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 last five years and was representative of a geographical mix of 10 local authorities across England.

Scope of the Audit

- 1.5 The audit examined Oldham Council's systems and procedures for the control of feed of non-animal origin (FNAO).

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)

- 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 office at Sir Robert Peacock House, Vulcan Street, Oldham on 8-9 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 The metropolitan borough of Oldham forms part of Greater Manchester. The area covers approximately 141 square kilometres. The east of the borough is a rural area characterised by moorland and valley villages. The west of the borough is a mixed urban area with more than one in five residents living in income deprived households. The population is estimated at 219,800 people.
- 1.9 Following a number of recent organisational restructures the latest being in July 2013, responsibility for the delivery of feed law enforcement activities falls under the remit of a small number of officers employed by the Trading Standards Team. The latest restructure resulted in significant changes with reallocation of roles to a new Lead Officer for Feed and a new Senior Trading Standards Officer with responsibility for Feed. As part of this process a review of all Feed related work undertaken to date was completed, a specific Feed Service Plan was produced and a written Feed Quality System implementing new procedures was also developed. The re-organisation led to a number of experienced officers with knowledge of animal feed leaving the Service and auditors acknowledged the significant challenges this posed to the small number of officers now responsible for the delivery of official controls in relation to animal feed. The Environmental Health Team contained animal welfare officers who inspected and licensed animal establishments in the area and planned to carry out some monitoring of animal feed issues at lower risk feed establishments.

1.10 The profile of Oldham Council's feed businesses according to figures submitted to the Agency for 2012/13 was as follows:

Type of Feed Premises	Number
Arable Farms	0
Livestock Farms	44
Manufacturers	0
Food businesses selling co-products/surplus food	2
Importers	0
Distributors/Transporters	0
Stores	8
Retailers	2
Total Number of Feed Premises	56

2.0 Executive Summary

2.1 Oldham Council was selected for audit as it had not been audited by the Food Standards Agency in the past five years in relation to animal feed. Auditors acknowledged that the audit had taken place at a time following a significant re-organisation of the Service. Despite financial pressures, the Authority confirmed its commitment to a risk-based animal feed service and interventions programme.

2.2 Key areas for improvement:

Feedingstuffs establishments interventions and inspections: The Authority needs to ensure that businesses are routinely informed about any contraventions following inspections and should take timely follow-up action to secure business compliance with feed hygiene legislation. The Authority should maintain a record of any such correspondence with businesses.

Internal monitoring: There was some evidence that internal monitoring was being undertaken through checks on feed business inspection histories. However the Authority should ensure that all feed law enforcement activities are monitored and that corrective actions are implemented where necessary.

3.0 Audit Findings

3.1 Organisations and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 In June 2013 the Authority had produced a Food Service Plan for 2013/14 which included limited references to feed law activities. Following a recent re-organisation in July 2013 however, the Authority had produced a separate specific Feed Service Plan for 2013/14, appropriately approved by the relevant Member. The Plan was broadly in line with service planning arrangements in the Framework Agreement providing useful details of the feed service, including its scope, numbers of full time equivalent (FTE) officers available, responsibilities and objectives. The Plan also contained appropriate references to feed hygiene legislation and centrally issued guidance including reference to the National Enforcement Priorities issued by the Food Standards Agency (FSA).
- 3.1.2 The Plan included details of the Authority's aim to work closely with other enforcement officers within the council, such as environmental health and animal welfare officers to try to improve the efficiency of the Service and to gather more intelligence on potential feed businesses in the area.
- 3.1.3 The Authority had a service level agreement (SLA) with a neighbouring authority to deliver feed law enforcement activities on their behalf and was also considering a similar arrangement with another neighbouring authority, details of which were provided in the Plan.
- 3.1.4 The Plan identified a number of Service improvements required, including the:
- development of a full range of documented policies and procedures for feed law activities
 - continued development of the feed premises database
 - continued identification of relevant feed businesses
 - need to further develop and maintain the competencies of officers carrying out feed law enforcement.
- 3.1.5 Auditors discussed the importance of identifying and assessing feed businesses at all stages of the feed chain, including hauliers and businesses potentially supplying chemicals to the feed industry. In addition the Plan would benefit from the inclusion of a reasoned estimate of the resources required to deliver the Service compared to the resources currently available, to identify and address any potential shortfalls.

- 3.1.6 Auditors also discussed the Authority's policy on announced and unannounced visits to feed establishments as stated in the Plan, and advised the Authority on the Agency's guidance as part of the national feed enforcement priorities.

Recommendation

- 3.1.7 The Authority should:

Ensure that future feed Service Plans routinely contain a detailed and reasoned estimate of the resources required to deliver the Service in accordance with the Feed Law Enforcement Code of Practice, compared to the resources available. The Plan should highlight any potential shortfall in resources required. [The Standard - 3.1]

Documented Policies and Procedures

- 3.1.8 In response to one of the areas of improvement identified in its Feed Service Plan, the Authority had recently developed a number of procedures linked to feed law enforcement which generally contained up to date legal references and useful guidance for officers. However insufficient time had elapsed since their introduction for auditors to fully assess whether they had been successfully implemented. Auditors discussed the importance of ensuring that these procedures are regularly reviewed and updated.

Officer Authorisations

- 3.1.9 The Authority had recently developed a documented procedure for the authorisation of its officers. The procedure would benefit from further review to include a suitable mechanism for the assessment of officer competencies linked to their level of authorisation. In addition, auditors discussed the benefits of linking this procedure with the identification of officer training and competency requirements.
- 3.1.10 The Authority provided evidence of a scheme of delegation and appropriate service managers held delegated powers to appoint and authorise officers in line with the Council's Constitution.
- 3.1.11 Officers carrying out feed law enforcement activities were specifically authorised under all relevant aspects of feed hygiene legislation, with the exception of the Official Food and Feed Controls (England) Regulations 2009. Auditors advised that legislation containing specific enforcement powers should be considered by the Council's legal department to ensure that officers were appropriately authorised.

3.1.12 File checks showed that officers currently involved in feed law enforcement were receiving a range of training relevant to their role including the assessment of HACCP based feed safety management systems (FSMS) and were generally achieving the minimum 10 hours of training based on continuing professional development (CPD) required by the Feed Law Enforcement Code of Practice (FLECP). Auditors did however recommend that due to their extra responsibilities the lead feed officer continued to develop their experience and competence in feed enforcement and inspections at higher risk feed establishments. This could include working with and observing experienced officers from other local authorities if necessary.

Recommendations

3.1.13 The Authority should:

- (i) Review its documented procedure for the authorisation of officers to include a suitable method of assessing officer competencies, linking this to the identification of officer training needs. [The Standard – 5.1]
- (ii) Review and update current authorisations to ensure that all officers are appropriately authorised under relevant legislation, consistent with their qualifications, training and experience. [The Standard – 5.3]
- (iii) Ensure that all authorised officers, including the lead feed officer, continue to receive the appropriate training needed to deliver their work in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 5.4]

3.1.14 An officer who regularly carried out feed law enforcement was interviewed to determine if the officer was able to demonstrate an appropriate level of competency and knowledge of the Service's procedures. The officer was able to show a good working knowledge of animal feed enforcement and the procedures for carrying out their duties.

Facilities and Equipment

3.1.15 The Authority maintained an electronic database for the recording of feed law enforcement activities that was capable of providing information necessary for official returns to the Agency. Checks on the Authority's database confirmed that it matched the list of registered feed establishments held by the Agency. The Authority's recently

developed intervention procedure also contained useful instructions for officers on data entry to maintain the accuracy of the database.

- 3.1.16 As part of the Service review in July 2013, the feed premises database had been reviewed by the lead feed officer to assess its accuracy. This exercise had identified a number of discrepancies involving business names and the accurate coding of some businesses in accordance with the FLECP. Auditors recommended that the Authority continue these database reviews on a regular basis to help ensure its accuracy.

Liaison with Other Organisations

- 3.1.17 The Authority had established liaison arrangements on animal feed matters with central government and local enforcement bodies across the region. Throughout the audit the Service provided evidence of its commitment and ability to liaise with other local authorities and external agencies via their regional liaison group. Such liaison is vital to ensure that information and intelligence on feed matters is gathered and shared within the region.
- 3.1.18 Auditors were informed that there were no relevant establishments in the area subject to medicated animal feed legislation and therefore no joint visits had taken place with the Inspections and Investigations Team (formerly Animal Medicines Inspectorate).
- 3.1.19 The Service had also closely liaised with other internal teams such as animal health and environmental health officers to provide further intelligence on potential feed issues.

3.2 Feed Control Activities

Feed Establishments Interventions and Inspections

- 3.2.1 The Service had developed a documented intervention procedure which provided detailed guidance for officers on the inspection of feed establishments.
- 3.2.2 Aided by funding from the FSA the Authority had carried out a number of inspections at higher risk feed premises identified from its list of registered feed premises. Inspection records for a number of businesses supplying waste food to the animal feed chain were assessed. In most cases these were the first inspections of such businesses. The Authority acknowledged that in recent years it had not been able to maintain the frequency of inspection for all medium and low risk feed premises due to limited resources. The Authority planned to use animal welfare officers to assess feed issues as part of animal health inspections on farms and primary producers and provided evidence of a template inspection form that had been developed to help these officers assess and record any feed issues during inspections.
- 3.2.3 Officers had completed a comprehensive aide-memoire to record the outcome of these higher risk inspections. Auditors did however recommend that officers provide a more detailed synopsis of feed activities actually taking place at businesses.
- 3.2.4 In three out of five of the files examined auditors noted that significant contraventions of feed hygiene legislation had been recorded by officers requiring immediate action, including deficiencies in HACCP documentation and potential contaminant issues. Despite these findings, in the majority of cases no evidence was available to show that businesses had been contacted to confirm these findings and to notify them of the remedial actions required. The Authority was therefore unable to demonstrate that in every case it had taken timely and effective follow-up actions to ensure business compliance. The lead feed officer had also carried out recent case reviews of businesses on the feed premises register and had highlighted similar issues. Auditors discussed the need for the Authority to develop and implement an action plan to address these issues on a risk basis, but also acknowledged that many of the businesses concerned were due for inspection in the near future. The Authority provided assurances that the issues found would be followed up as a priority and agreed to provide auditors with further information on the status of certain businesses that had the potential to supply food to the animal feed chain without adequate controls being in place.
- 3.2.5 Auditors recommended the continued implementation of the Service's feed inspection procedure which provided detailed guidance for officers on animal feed interventions, follow-up actions and relevant

references to the national enforcement priorities in accordance with the FLECP.

- 3.2.6 The Authority had no approved establishments under Feed Hygiene Regulation (EC) No 183/2005.

Recommendations

3.2.7 The Authority should:

- (i) Ensure that feeding stuffs premises inspections are carried out at a frequency which is not less than that determined under the relevant inspection rating system and in accordance with the legislation, Feed Law Enforcement Code of Practice or centrally issued guidance. [The Standard – 7.1]
- (ii) Take timely and appropriate follow-up action on any non-conformance found following interventions in accordance with the Authority's enforcement policy. [The Standard - 7.3]

Verification Visit to a Feed Premises

- 3.2.8 During the audit, a verification visit was undertaken to a feed manufacturer processing waste food products such as bakery produce, 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.
- 3.2.9 The accompanying officer was able to demonstrate extensive feed law enforcement knowledge, and the ability to carry out a thorough assessment of the manufacturing systems including HACCP, compliance with feed compositional requirements and general feed hygiene requirements in accordance with the relevant legislation.

Feed Inspection and Sampling

- 3.2.10 The Authority's commitment to the use of sampling as part of a risk-based intervention programme was outlined in the Feed Service Plan 2013/14. However in the last two years the Authority had not carried out any routine feed sampling.
- 3.2.11 The Agricultural Analyst appointed by the Service was designated as an Official Control Laboratory for animal feed analysis and was

properly accredited. Auditors were advised that the Service had liaised with the Agricultural Analyst in relation to feed sampling to discuss and agree this years' feed sampling programme funded by a grant from the FSA. Auditors were informed that the Authority would also consider the development of a separate risk-based sampling programme in addition to any regional FSA funding if necessary.

- 3.2.12 The Authority had recently developed a comprehensive feed sampling procedure and officers had recently attended relevant sampling training courses. The Authority had access to suitable shared sampling equipment via the regional agricultural analyst. Auditors did discuss the benefit however of reviewing these arrangements to ensure that the Authority has appropriate access to relevant equipment at all times as required.

Recommendation

3.2.13 The Authority should:

Set up, maintain and implement documented sampling programme in accordance with the Feed Law Enforcement Code of Practice and centrally issued guidance.
[The Standard - 12.4]

Enforcement

- 3.2.14 The Authority had developed a generic enforcement policy outlining the Authority's commitment to a proportionate and graduated approach to enforcement.
- 3.2.15 The Authority had recently developed enforcement procedures for most of the enforcement options available to officers. If implemented these procedures should provide useful guidance and advice for officers when carrying out any enforcement activities.
- 3.2.16 At the time of the audit the Service had not found it necessary to carry out any formal enforcement actions apart from the suspension of registration for a business proposing to provide food grade chemicals to the animal feed chain without having the necessary controls in place.

Feed Complaints, Primary Authority Scheme and Home Authority Principle

- 3.2.17 The Authority had developed a feed complaints procedure for dealing with complaints and referrals from the public, businesses and other local authorities, including reference to the Primary Authority Scheme. It provided detailed instructions for officers in the handling and processing of feed complaints. The Authority did not have any formal or informal Home Authority or Primary Authority arrangements in place with local businesses.
- 3.2.18 At the time of the audit the Authority had only received one referral in recent times related to a feed issue. The Authority had investigated the referral appropriately and taken follow-up action as necessary.

Feed Safety Incidents

- 3.2.19 The Authority had developed a procedure on feed alerts and incidents. A delegated officer could access and action the emails in the absence of the Lead Officer.
- 3.2.20 A corporate out of hours contact system was in place which was utilised to cover the receipt of notifications from the Agency on feed alerts and incidents. In the light of the arrangements in place with a neighbouring Authority to deliver feed enforcement, auditors advised that the Authority review its arrangements for out of hours cover for feed related incidents to ensure that the Authority has appropriate access to suitably experienced and authorised staff whenever needed. The Authority had no record of having to respond to any feed related incidents in the last two years.

Advice to Business

- 3.2.21 The Authority had not developed or delivered any recent specific guidance and advice for businesses in relation to animal feed issues. Auditors discussed examples of advice to businesses developed by other local authorities and discussed the benefits of such advice in educating businesses about risks in relation to animal feed and waste food issues and duties under relevant feed legislation.

3.3 Internal Monitoring and Third Party or Peer Review

Internal Monitoring

- 3.3.1 The Authority had developed 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. The procedure outlined the Authority's intention to review a range of the Service's activities at regular intervals.
- 3.3.2 Auditors noted some evidence of recent monitoring of intervention records and past enforcement histories and monitoring of the feed premises database. Auditors recommended the implementation of documented risk-based and proportionate internal monitoring covering all aspects of the feed law enforcement service to ensure consistency amongst officers and the appropriate escalation of enforcement where necessary.

Recommendation

3.3.3 The Authority should:

Review and implement its documented internal monitoring procedure to include quantitative and qualitative monitoring of feed law enforcement activities across all areas of the Standard. The procedure should reflect the monitoring activities already undertaken in practice and should be aimed at verifying the Service's conformance with relevant legislation, official guidance and the Standard. 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 with some hard copy paper records. Records in relation to recent interventions were generally up to date and accurate.

Third Party or Peer Review

- 3.3.5 The Authority had not participated in any inter-authority audit, third party or peer review process relating to the feed service in the last two years.

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ANNEX A Action Plan for Oldham Council

Audit date: 8-9 October 2013

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.7 Ensure that future feed Service Plans routinely contain a detailed and reasoned estimate of the resources required to deliver the Service in accordance with the Feed Law Enforcement Code of Practice (FLECP), compared to the resources available. The Plan should highlight any potential shortfall in resources required. [The Standard - 3.1]	30/04/14	The 2014/15 Feed Service Plan and future plans will contain a detailed and reasoned estimate of the resources required to deliver the Service in accordance with the Feed Law Enforcement Code of Practice (FLECP). This will include a detailed and reasoned estimate of the resources required to deliver the Service within the Borough and also for any Service provided outside of the Borough.	None.
3.1.13(i) Review its documented procedure for the authorisation of officers to include a suitable method of assessing officer competencies, linking this to the identification of officer training needs. [The Standard – 5.1]	Completed		The authorisation policy 'FQS PO01' has been amended and a matrix incorporated which enables a suitable method of assessing officer competencies, linking this to the identification of officer training needs.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.13(ii) Review and update current authorisations to ensure that all officers are appropriately authorised under relevant legislation, consistent with their qualifications, training and experience. [The Standard – 5.3]	Completed		The authorisations have been reviewed and amended to include reference to the Official Food and Feed Controls (England) Regulations 2009. The amended authorisation policy 'FQS PO01' (referred to above) ensures that officers are appropriately authorised under relevant legislation, consistent with their qualifications, training and experience.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.1.13(iii) Ensure that all authorised officers, including the lead feed officer, continue to receive the appropriate training needed to deliver their work in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 5.4]</p>	<p>Completed and ongoing</p>	<p>The Service will continue to support all authorised officers to ensure that they continue to receive the appropriate training needed to deliver their work in accordance with the FLECP. Since the audit two authorised officers have attended an appropriate training course (Primary Production – Feed Hygiene on Farms). In terms of enabling the lead feed officer to develop their experience and competence in feed enforcement and inspections at higher risk feed establishments, the Service will look to seek assistance from other local authorities to enable observation of experienced officers during such visits.</p>	<p>Attendance by two authorised officers on appropriate training course.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.2.7(i) Ensure that feeding stuffs premises inspections are carried out at a frequency which is not less than that determined under the relevant inspection rating system and in accordance with the legislation, Feed Law Enforcement Code of Practice or centrally issued guidance. [The Standard – 7.1]	Completed and ongoing	The Feed Service Plan 2013/14 has been produced and inspections are carried out at a frequency in line with the NTSB Risk Scheme, with the exception of premises which are low risk but that are categorised as high risk due to the weighting factor for businesses not yet assessed. In these cases where animal welfare officers have advised they are scheduled to undertake an inspection such visits will be completed by these officers. The reasoning for this is to reduce the burden on businesses. This may result in the frequency being outside that detailed in the NTSB scheme, but it will be within acceptable parameters (ie within 18 months). Visits will be undertaken by authorised feed officers, or where appropriate, suitably authorised animal welfare officers.	Frequency of inspections (interventions) at feeding stuffs establishments detailed in the Feed Service Plan 2013/14.
3.2.7 (ii) Take timely and appropriate follow-up action on any non-conformance found following interventions in accordance with the Authority's enforcement policy. [The Standard - 7.3]	Completed and ongoing	Follow procedures in the Feed Quality System to ensure timely and appropriate follow-up action on any non-conformance in accordance with the Authority's enforcement policy.	The Feed Quality System implemented in September 2013 addresses this matter.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.2.13 Set up, maintain and implement documented sampling programme in accordance with the Feed law Enforcement Code of Practice and centrally issued guidance. [The Standard - 12.4]	31/03/14	Documented sampling programme to be set up, maintained and implemented in accordance with the FLECP and centrally issued guidance.	Advice sought of the analyst to enable sampling programme to be devised based on the establishments located within the Borough.
3.3.3 Review and implement its documented internal monitoring procedure to include quantitative and qualitative monitoring of feed law enforcement activities across all areas of the Standard. The procedure should reflect the monitoring activities already undertaken in practice and should be aimed at verifying the Service's conformance with relevant legislation, official guidance and the Standard. Records of monitoring checks should be maintained. [The Standard - 19.1, 19.2 and 19.3]	Completed		The internal monitoring procedure 'FQS P10' has been amended to ensure greater focus is given to medium and higher risk rated premises.

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:

- Food Service Plan 2013/14
- Feed Service Plan 2013/14
- Authorisation of Officers procedure 2013
- Feeding Stuffs Inspections procedure 2013
- Feed standards inspection forms
- Approval and Registration of Feed Establishments procedure
- Range of individual enforcement procedures
- Food standards and feeding stuffs complaints procedure 2013
- Internal Monitoring Procedure 2013
- Enforcement Policy
- Cabinet Minutes (various)
- Minutes of Liaison Group Meetings (various)
- Management Team and Team Meeting minutes (various)

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

- Records of Inspection

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

- Service Manager
- Feed Lead Officer
- Senior Trading Standards 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 visit to a local feed manufacturer was carried out as part of the audit. 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.