

**Report on the audit of Official Controls on Feed
of Non-Animal Origin (FNAO) and Feed
Establishments
Including Primary Producers**

Oxfordshire County Council
6-8 September 2016



Foreword

The audit of local authority feed and food law enforcement services forms 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 (LAs). The LA regulatory functions for animal feed controls are principally delivered through their Trading Standards Services.

Agency audits assess local authorities' 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), a Feed Law Code of Practice (England) (published May 2014) and a Feed Law Practice Guidance (England) (updated June 2014).

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 food safety, standards and feeding stuffs. Parallel local authority audit schemes are implemented by the Agency's offices in Wales and Northern Ireland.

Following a review of the delivery of official controls for feed law enforcement the FSA introduced a new feed delivery model (NFDM)¹ in April 2014 to promote consistency, efficiency and value for money in the delivery of feed official controls. This delivery model has been implemented in association with the National Trading Standards (NTS) and it promotes a regional approach to delivery, coordinated by NTS.

An innovation of the NFDM was the introduction of a system of 'earned recognition' whereby Feed Business Operators (FeBOs) who demonstrably maintained high standards of feed safety by taking appropriate steps to comply with the law, may have these standards recognised by LAs when determining the frequency of their official controls.

This programme of focused audits is being undertaken to provide assurance to the FSA that the new feed delivery model has been effectively implemented by local authorities and that official controls, as laid down in the Agency's Feed Law Enforcement Code of Practice, Practice Guidance and Framework Agreement, in

1

https://khub.net/documents/portlet_file_entry/5524476/New+Feed+Delivery+Model+06.07.2016.pdf/2e8585ff-3e92-4362-928a-5d1b6da2f594?download=true

regard to FNAO are being carried out by LAs, in order to safeguard animal and public health.

This audit forms part of the programme of audits across a number of animal feed authorities and the findings will be incorporated into a summary report on the outcomes of the overall focused animal feed audit programme.

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 Oxfordshire County Council with regard to feed law enforcement. The audit was undertaken as part of the Agency's focused audit programme on feed controls in England. This 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 FSA's Regulatory Delivery Division, please email LAAudit@foodstandards.gsi.gov.uk or phone 01904 232116.

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 Oxfordshire County Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme. The Agency has taken account of the European Commission guidance² on how such audits should be conducted.
- 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 focused audits is to provide assurance to the FSA that the new feed delivery model has been effectively implemented by local authorities. The Agency has taken account of the European Commission guidance on how such audits should be conducted.
- 1.4 Oxfordshire County Council was included in the Food Standards Agency's programme of audits of local authority feed law enforcement services, having not been audited for feed service delivery by the Agency in the past five years and was representative of a geographical mix of 11 local authorities selected across England.

² 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 Oxfordshire County Council's systems and procedures for the control of feed of non- animal origin (FNAO).
- 1.6 The audit scope included an assessment of local arrangements for implementing the NFDM and included:
- Feed service planning, delivery and review
 - Competence of officers
 - Implementation and effectiveness of feed control activities
 - Maintenance and management of appropriate feed premises database and records in relation to official controls at feed business premises
 - Effectiveness of the Lead Officer role for feed
 - Effectiveness of the Regional Lead role for feed
 - Accuracy and delivery of official reports to the Agency
- 1.7 The on-site element of the audit took place at the Authority's office at Graham Hill House, Electric Avenue, Oxford from 6-8th September 2016. The audit included a reality check at a feed establishment to assess the effectiveness of official controls implemented by the Service.

Background

- 1.8 Oxfordshire is divided into five districts. These districts are: Cherwell, South Oxfordshire, Vale of White Horse, West Oxfordshire, and Oxford City. The County has a population of 666,100 and is the most rural county in the south east of England. The Authority had approximately 1785 feed businesses.
- 1.9 The Trading Standards Service was responsible for the delivery of feed hygiene within the County, and was based within the Oxfordshire Fire and Rescue Service, within the Authority's organisational structure. There was no distinct feed safety team, as all officers carrying out feed delivery work did so as part of a broader spectrum of trading standards duties.

1.10 The profile of Oxfordshire County Council's feed businesses as at 31 March 2015 according to their submitted enforcement return was as follows:

Type of Feed Premises	Number
Manufactures and packers	13
Distributors/Transporters	17
Retailers	0
Co-products/surplus food	74
Stores	4
Arable farms	42
Livestock farms	1635
Importers	0
Total Number of Feed Premises	1785

2.0 Executive Summary

2.1 The Authority was generally delivering risk-based inspection planning and performing both its lead officer role well in terms of liaison, training planning and communication. A number of potential improvements in the overall arrangements and controls for feed service delivery were identified in order to fully meet the requirements of the New Feed Delivery Model, Framework Agreement and the Feed Law Code of Practice (FELCP). The key strengths and areas for improvement for the LA are set out below.

2.2 Strengths:

Service Planning & Delivery

2.2.1 It was clear that interventions were effective particularly the assessments of the compliance of premises and systems, including HACCP based systems, to legally prescribed standards had been carried out. Additionally follow up action to non-compliant feed premises was undertaken as appropriate.

2.2.2 The Service had utilised Regional Feed Officers as part of the Trading Standards South East (TSSE) Regional arrangements.

2.2.3 It was encouraging that the department had maintained a training budget to ensure that officers development needs could be met. It was clear from discussions with staff that the Service was committed to ensuring staff were well trained and competent to carry out feed law enforcement duties.

2.2.4 The Authority had recently taken part in a volunteer scheme, which involved using a volunteer member of staff to undertake back office work to support the delivery of official controls. Although this scheme was still in early days, the Authority was hopeful that it would be successful as seen in other organisations, and in time the volunteers remit could be extending to include undertaking alternative enforcement strategies (AES) at Feed businesses.

2.3 Key area for improvement:

Service Planning

2.3.1 The Service Plan would benefit from more detail in regard to the demands placed upon the Service and a comparison of full time

equivalents available to the Service against those needed to deliver the full range of official controls for feed.

- 2.3.2 The Service Plan did not fully detail the demands on the Service, particularly the approach to the intervention programme with reference to the national enforcement priorities.

Intervention Programme

- 2.3.3 There were some anomalies with the Authorities desk top model, which meant that there were high risk feed businesses that were not inspected at the frequencies prescribed in the Feed Law Code of Practice.

Officer Authorisation

- 2.3.4 The extent and limitations of officers were not defined in their authorisations.

Internal Monitoring

- 2.3.5 The monitoring procedures should be extended to cover all types of monitoring activity taking place.

3.0 Audit Findings

3.1 Feed service planning, delivery and review

Implementation of the Agency's National Feed Priorities document

- 3.1.1 The Authority had developed a Food and Feed Service Plan for 2016/17, which detailed how it would delivery official controls for feed within its area.
- 3.1.2 The Service Plan had generally been developed in accordance with the Service Planning Guidance in the Framework Agreement. The Plan outlined the approach to Earned Recognition for feed businesses and made reference to the Authority's enforcement policy. The Service Plan needed further development to include greater detail in regard to the demands placed on the Service including full details of the intervention programme and a reasoned estimate of the resources required in terms of full time equivalent staff (FTE), to meet the demands on the feed service. Auditors discussed the discrepancy between the total number of feed premises detailed in the plan, against the numbers highlighted on the feed register and the database spreadsheet the Authority submitted prior to the audit.

- 3.1.3 The Service Plan should make appropriate reference to the Agency's National Enforcement Priorities (NEP) document, and detail how the Authority intends to have regard and implement these priorities within its official control programme. However the Service Plan did make reference to the National Sampling Priorities, and made a commitment to bid for funding should these be relevant to feed businesses in the area. The Lead Officer for feed explained that the NEP document is considered to see how the stated priorities will influence the delivery of the Services' annual programme of official controls. There was clearly a level of awareness of priorities within the Services management levels. Based upon discussions and interviews with staff during the audit there also appeared to be a detailed awareness amongst staff of how the priorities influenced the day to day execution of their duties.
- 3.1.4 Although the Service Plan did not document the review of animal feed enforcement for the previous year, officers explained that they reviewed the plan each quarter and at team meetings.
- 3.1.5 The Service had utilised the Regional Feed Officers as part of the Trading Standards South East (TSSE) Regional arrangements. The potential advantages were discussed, that this new approach had over the previous delivery system which involved the use of commercial contractors. The Authority had recently taken part in a volunteer scheme, which involved using a volunteer member of staff to undertake back office work to support the delivery of official controls. Although this scheme was still in early days, the Authority was hopeful that it would be successful as seen in other organisations, and in time the volunteers remit could be extending to include undertaking alternative enforcement strategies (AES) at Feed businesses.
- 3.1.6 In previous years the Plan had been agreed by the Head of Service (HoS). However, this year the Service had decided to seek approval by the Directorate Leadership Team. The Plan was currently awaiting approval.

Recommendation 1 - Service planning

[The Standard 3.1]

[The National Feed Enforcement Priorities 2016/17]

Further develop the service delivery plan in accordance with Service Planning Guidance in Chapter 1 of the Framework Agreement to include:

- greater detail in regard to the demands placed on the Service, particularly the approach to the intervention programme with reference to the national enforcement priorities; and
- a comparison of the numbers of FTE officers needed to deliver the programme against those available to the Service.

- 3.1.7 Auditors were advised that officers had encountered difficulties in attempting to share information with other regulators.

Effectiveness of the implementation and monitoring of earned recognition for feed establishments

- 3.1.8 The Service had implemented a system for Type 1 earned recognition (ER) for members of an FSA Approved Assurance Scheme (AAS). A substantial number of premises that were members of the schemes had been tagged on the database, however this was an ongoing process. It was established that the Service had subscribed to the Red Tractor scheme member checker service but not that of the AIC participant alert service. The team had configured the database to allow officers to record the type of ER that is appropriate for the next routine intervention.
- 3.1.9 Systems had been implemented to take into account notifications from RTA Approved Assurance Schemes (AAS's) where membership had been withdrawn.
- 3.1.10 File checks showed that frequencies of inspections for assurance scheme members were not always in line with the Feed Law Practice Guidance.
- 3.1.11 The Service had implemented a system for Type 2, tier 1 ER in the format of a postal questionnaire for businesses which were broadly compliant but not members of an AAS.

- 3.1.12 The Service had produced a useful document and flow chart that outlined ER, and had committed to develop an ER work instruction which is highlighted as an area for improvement in the current Service Plan.
- 3.1.13 The database contained a number of entries where the inspection interval and / or 'Level of Compliance' (LOC) score and total risk score did not tally.
- 3.1.14 Auditors discussed the need to amend inspection intervals on the database to correspond with the ER status and LOC score in a number of cases, in accordance with the Feed Law Code of Practice. It was clear that a small number of inspection intervals were incorrect because of inputting errors.

Recommendation 2 – Earned recognition & database management

[Feed law Code of Practice, Chapter 5.3]

[The Standard, paragraph 11.2]

Review and correct all anomalies in and between AAS status, inspection intervals, level of compliance scores and total risk scores, with a view to recognising earned recognition, maintaining database accuracy and improving the efficiency of use of limited feed official control resources.

Promotion of the importance of feed hygiene

- 3.1.15 Although the Service Plan did not include any details of feed safety promotional work, and the Authority had not planned any promotional events for feed for 2016/17, the Service did provide advice to businesses on request. The Authority had previously undertaken a promotional activity with farms and feed businesses in relation to counterfeit pesticides.
- 3.1.16 Auditors were advised that officers also discussed food waste and feed arrangements with relevant food businesses during food standards inspections as a matter of course, to promote awareness of feed requirements in this sector in accordance with the National Enforcement Priorities.

3.2 Competence of officers

- 3.2.1 The Service had produced a documented procedure for the authorisation of officers. All officers had received authorisation for all areas of feed

legislation irrespective of their level of competency. File checks indicated that authorisation documents did not define the extent and limitations of officers' powers in relation to their feed duties, contrary to advice from the FSA and the Standard in the Framework Agreement on Feed and Food Official Controls. However in practice officers only carried out duties appropriate to their individual qualifications and competencies. Auditors discussed the benefits of improving the system of officer authorisation, including the implementation of an authorisation matrix, so that each individual officer can be specifically authorised in accordance with their qualifications and competence.

- 3.2.2 Generally the list of legislation for authorised officers was up to date with exception of the Official Feed and Food Control Regulations 2009 which were not included.
- 3.2.3 Training needs were identified at annual staff appraisals and through the competency assessments, and there was a departmental training budget to ensure that development needs could be met. It was clear from discussions with staff that the Service was committed to ensuring staff were well trained and competent to carry out feed law enforcement duties.
- 3.2.4 Officer qualifications and training records were maintained by the Authority and were easily retrievable. All officers had received the required number of hours CPD based on the principles of continuous professional development, received HACCP training where appropriate, and general enforcement training. Auditors noted that officers had attended a variety of training courses relevant to their roles including detailed specialist courses on traceability and veterinary medicines.
- 3.2.5 Officers are registered with, and generally engage on the Agriculture Community Knowledge Hub forum.

3.3 Implementation and effectiveness of feed control activities,

Inspection

- 3.3.1 The Service had made good progress on identifying all the feed establishments in the area for inclusion on the feed register and database and checks showed that generally FeBOs had been correctly classified for all activities.
- 3.3.2 The Service was using the FSA risk rating scheme. File checks on a sample of inspections carried out showed that feed premises had been effectively and consistently risk rated.
- 3.3.3 It was clear that during interventions, officers had made effective assessments to legally prescribed standards of the compliance of

premises and systems, including HACCP based systems. The Service had utilised model template inspection forms developed by the FSA for carrying out inspections to capture inspection findings and to help officers demonstrate that businesses were being inspected against all relevant legislation.

- 3.3.4 File checks showed that the contemporaneous observations of officers had been recorded in detail and records were easily retrievable. Of the files checked interventions had been carried out at the frequencies specified by the FELCP and in line with the principles of ER.
- 3.3.5 Auditors noted that adequate follow up action including revisits had been undertaken where appropriate and discussed the benefit in having a documented set of criteria for revisits and/or follow up action.
- 3.3.6 There appeared to be some anomalies on the Authority's annual desktop model. Auditors discussed how the Service, populated the desktop model and from which developed the annual intervention programme. There appeared to be some higher risk FeBOs that were due an inspection but did appear in the desktop model and others that did but then had not been identified as part of the inspection programme. This meant that high risk feed businesses were not being inspected at the correct frequency as identified by the Feed Law Code of Practice.

Recommendation 3 – Desktop Model

[New Feed Delivery Model]

[Feed Law Code of Practice 4.1.2 and 4.1.4]

[The Standard, paragraph 7.1]

Ensure that the Desktop Model and intervention programme is compiled and implemented on a risk basis in accordance with the New Feed Delivery Model and the Feed Law Code of Practice to ensure interventions are carried out at the frequencies prescribed in the Feed Law Code of Practice.

Sampling

- 3.3.7 The Service had developed and implemented appropriate sampling procedures, and a documented feed sampling programme co-ordinated regionally, agreed with NTS and had been compiled with due consideration to National Enforcement Priorities.

- 3.3.8 We discussed the Authorities intention to undertake sampling at R4 premises for carryover of coccidiostats and/or medicines in non-target feed.
- 3.3.9 The records of five informal sample results were checked. All the samples taken had been recorded and documented with analytical results being kept on file. In all cases, follow up action had been taken to address the concerns found, including detailed contact and advice to businesses.

Alternative enforcement

- 3.3.10 The Service had sent out questionnaires as part of a type 2 tier 1 AES, to two relevant FeBOs to encourage them to update their records with the Service and report the activities they were carrying out as part of their feed businesses. File checks showed that the selection of type 2 tier 1 AES was appropriate for both businesses.

Enforcement

- 3.3.11 The Authority had not found it necessary to carry out any formal enforcement activities in the last two years. The Service had an enforcement policy which officers explained would be consulted in the implementation of any enforcement activity.

Imports and 3rd Country Representatives

- 3.3.12 The Authority had no ports within its administrative area. The Service was aware of the requirements surrounding imports and 3rd Country Representatives. The Authority no longer had any feed businesses within the County acting as representatives for 3rd Country establishments.
- 3.3.13 Officers reported that they undertook inland imported feed checks, however this was generally not recorded on the inspection paperwork. Auditors acknowledged that the current model FSA forms did not provide a field for this information.

Verification Visit to a feed establishment

- 3.3.14 During the audit, a verification visit was undertaken to a local brewery that supplied its spent grain as feed to a local farmer, 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. It was clear from the visit that the officer had a good

working relationship with the business, was familiar with the processes involved and had a good knowledge of the relevant legislation.

3.4 Maintenance and management of appropriate feed premises database and records

- 3.4.1 The Service had developed a specific procedure for updating and maintaining the feed premises database in relation to food/feed premises. This work instruction provided useful guidance to officers to ensure the accuracy and completeness of data entry on the feed premises database. Although the document did not describe how the Authority ensures that new feed businesses are identified, the officers discussed the various routes that new food businesses are highlighted. Periodically validation reports were run to target specific data entry errors and these were raised with the officers concerned.
- 3.4.2 Access to the database is managed by log-in requirements and user privileges.
- 3.4.3 Auditors carried out a number of database checks prior to the audit which were subsequently discussed with officers of the Authority. Most of the anomalies found are described in chapter 3.1.13 of this report.

3.5 Lead Officer role for feed

- 3.5.1 Lead officer arrangements were discussed in detail in terms of the responsibilities of the role for:
- feed programme bidding,
 - internal reporting,
 - ensuring staff training and competency,
 - liaison with other feed leads in the regions,
 - consistency, and
 - dissemination of information to staff.
- 3.5.2 The knowledge of the lead feed officer of the requirements of the new feed delivery model was generally good and auditors identified no areas for improvement in respect of liaison, the assessment of training needs and the planning and delivery of training, with the Authority able to demonstrate compliance in these areas.
- 3.5.3 The Lead Officer is a Member of the National Agriculture Panel and the TSSE regional group. The lead Officer maintains links with the National Animal Feeds Port Panel and various other relevant agencies as appropriate. Auditors discussed the importance in attending these meetings in order to remain up to date. The Service Plan should detail

these liaison arrangements that are in place and highlight this as a demand on the Service.

- 3.5.4 The Service had a documented procedure for the monitoring of feed interventions and AES programme. The documented procedure did not include all areas of feed law enforcement. Although the lead officer highlighted that in practice monitoring of sampling and complaints is undertaken despite it not being mentioned in the procedure. The Service had recently produced a new form to record monitoring activities, although this had yet to be used in practice.

Recommendation 4 – Internal monitoring

[The Standard, paragraph 19.1 & 19.2]

Set up, maintain and implement a documented internal monitoring procedure for all aspects of the feed service to verify its conformance with the Standard, relevant legislation, Code of Practice, New feed delivery model and other centrally issued guidance.

This procedure shall include the monitoring of intervention paperwork, including risk rating determination and update, and inspection data entry by feed officers.

Records of all internal monitoring, including annual shadowed inspection visits, shall be made and kept for at least 2 years.

3.6 Regional Lead role for feed

- 3.6.1 Auditors discussed that the arrangements with the regional feed lead were effective, with well-structured and organised meetings. The region could consider utilising teleconference facilities to enable a wider attendance at meetings.

3.7 Accuracy and delivery of official feed reports to the Agency

- 3.7.1 The inaccuracies in relation to intervention frequencies of feed businesses identified in the feed database during this audit, have likely affected the accuracy of the NTS desktop exercise and may have therefore influenced the validity of subsequent funding. Anomalies with the NTS annual desktop exercise compared with the Services' inspection programme were discussed.

3.7.2 The Service does not have any specific documented procedures for assessing the accuracy of official feed reports to the Agency and generally follows official guidance for the submission of returns. In practice NTS returns are checked manually to ensure data is correctly entered.

3.7.3 The NTS quarterly monitoring return was accurate. Checks on the UKFSS return prior to the audit showed that this had also been filed accurately. There were no technical issues with the uploading and submission of the returns.

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ANNEX A - Action Plan for Oxfordshire County Council

Audit date: 6-8 September 2016

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>Recommendation 1 - Service planning [The Standard 3.1] [The National Feed Enforcement Priorities 2016/17]</p> <p>Further develop the service delivery plan in accordance with Service Planning Guidance in Chapter 1 of the Framework Agreement to include:</p> <ul style="list-style-type: none"> • greater detail in regard to the demands placed on the Service, particularly the approach to the intervention programme with reference to the national enforcement priorities; and • a comparison of the numbers of FTE officers needed to deliver the programme against those available to the Service. 	<p>June 2017</p>	<p>To include the recommended actions within the Service's 2017/18 plan.</p>	
<p>Recommendation 2 – Earned recognition & database management [Feed law Code of Practice, Chapter 5.3] [The Standard, paragraph 11.2]</p> <p>Review and correct all anomalies in and between AAS status, inspection intervals, level of compliance scores and total risk scores, with a view to recognising earned recognition, maintaining database accuracy and improving the efficiency of use of limited feed official control resources.</p>	<p>On-going</p> <p>June 2017</p> <p>On-going</p>	<p>Improve our ability to maintain an up to date local record of traders who are within an approved assurance scheme.</p> <p>Review existing working instructions that relate to the accuracy of data capture and inputting, providing training to both the team in general, as well as individual support</p> <p>To continue the on-going programme of data cleansing and premise record accuracy</p>	<p>Our lead officer has signed up to the AIC alert service and is monitoring incoming emails.</p> <p>Novel use of volunteers to add capacity to our ability to maintain database accuracy</p>

<p>Recommendation 3 – Desktop Model [New Feed Delivery Model] [Feed Law Code of Practice 4.1.2 and 4.1.4] [The Standard, paragraph 7.1]</p> <p>Ensure that the Desktop Model and intervention programme is compiled and implemented on a risk basis in accordance with the New Feed Delivery Model and the Feed Law Code of Practice to ensure interventions are carried out at the frequencies prescribed in the Feed Law Code of Practice.</p>	<p>On-going</p> <p>February 2017</p>	<p>Recommendation 3 relates closely to the recommended action in point 2.</p> <p>To continue the on-going programme of data cleansing and premise record accuracy – including the merging of premises within the LA database.</p> <p>To introduce checks, by the senior lead officer, between the Desktop Model, the Inspection & Sampling Submission and the Feed Hygiene Register</p>	<p>Lead officer has already begun to link these activities together, to cross-reference the data and improve accuracy.</p>
<p>Recommendation 4 – Internal monitoring [The Standard, paragraph 19.1 & 19.2]</p> <p>Set up, maintain and implement a documented internal monitoring procedure for all aspects of the feed service to verify its conformance with the Standard, relevant legislation, Code of Practice, New feed delivery model and other centrally issued guidance.</p> <p>This procedure shall include the monitoring of intervention paperwork, including risk rating determination and update, and inspection data entry by feed officers.</p> <p>Records of all internal monitoring, including annual shadowed inspection visits, shall be made and kept for at least 2 years.</p>	<p>June 2017</p> <p>June 2017</p>	<p>To document the existing internal monitoring activities, reviewing the current procedures</p> <p>To document the impact of shadowed inspection visits that are undertaken and retain relevant records</p>	

ANNEX B - Audit Approach/Methodology

Audit resource was targeted at the key risk areas. We examined any relevant records, instructions, documents, and evaluated procedures and outcomes. We also conducted appropriate audit testing to form an opinion on the controls in place.

The approach consisted of desktop reviews of information requested from the LA in a pre-visit questionnaire, and a 2 day onsite audit consisting of:

- Examination of plans, policies and procedures.
- Examination of file records.
- Review of database records
- Interviews with local authority officers - opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.
- On-site verification check:
A visit to a local brewery 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 and competent officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of food and feed law.
Feed Law Code of Practice	Government Code of Practice issued under regulation 6 of the Official Feed and Food Controls Regulations 2009 as guidance to local authorities on the execution and enforcement of feed law.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards, food hygiene at the level of primary production 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 not of animal origin. Products that do not fall under the requirements of the veterinary control regime.
The DG Health and Food Safety - Audit and Analysis	Part of the European Commission, formerly known as the Food and Veterinary Office (FVO).
Feed Law Enforcement	Government Code of Practice issued under the

Code of Practice	Official Feed and Food Control Regulations 2009.
Feeding stuffs	Term used in legislation meaning feed, including additives and pet food, whether processed, partially processed or unprocessed, intended to be used for oral feeding to animals.
Food/feed hygiene	The legal requirements covering the measures and conditions necessary to control hazards to ensure fitness for human consumption of a foodstuff/animal consumption of a feed, taking into account its intended use.
Food/Feed standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food/feed
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 to the Agency on their feed enforcement activities .e. numbers of inspections, samples, prosecutions and notices.</p> <p>Under the Audit Scheme the Food Standards Agency conduct 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 feed safety management system used within 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 the prescribed manner laid down in Regulation EC. No 152/2009 laying down the methods of sampling and analysis for the official control of feed.
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.
New Feed Delivery Model (NFDM)	NFDM is a multi-faceted solution to improve the effectiveness of official feed controls, delivered in partnership with key stakeholders, ensuring timely, appropriate, proportionate and consistent delivery of controls to secure compliance with feed law.
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.
Risk rating	A system that rates food/feed premises according to risk and determines how frequently those premises should be inspected.
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, food hygiene at the level of primary production and feeding stuffs legislation.
Trading Standards Officer (TSO)	Officer employed by the local authority who, amongst other responsibilities, may enforce food standards, food hygiene at the level of primary production 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 (including at the level of primary production), food standards and feeding stuffs enforcement.