

Meeting of:	Shared Regulatory Services Joint Committee
Date of Meeting:	Tuesday, 10 September 2019
Relevant Scrutiny Committee:	Homes and Safe Communities
Report Title:	Shared Regulatory Services Food Law Enforcement Service Plan 2019/20
Purpose of Report:	To seek approval for the Health and Safety Enforcement Service Plan for the Shared Regulatory Service for 2019/20
Report Owner:	Miles Punter - Director of Environment and Housing
Responsible Officer:	Dave Holland Head of Shared Regulatory Services
Elected Member and Officer Consultation:	No Elected Members have been consulted. The following officers have been consulted ; Assistant Director, Cardiff Council, Head of Legal and Regulatory services, Bridgend County Borough Council
Policy Framework:	This is a matter delegated to the Joint Committee
Executive Summary:	<ul style="list-style-type: none"> The report appraises the Committee of the work of the Shared Regulatory Service in respect of Food and Feed law. The report requests the Committee to approve the Food and Feed Law Enforcement Service Plan for the Shared Regulatory Service for 2019/20.

Recommendations

1. Approve the 2019/20 Food and Feed Law Enforcement Plan.
2. Authorise the Head of the Shared Regulatory Services to make administrative amendments to the 2019 /20 Food and Feed Law Enforcement Service Plan should the need arise.

Reasons for Recommendations

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

1. Background

- 1.1 The Councils have a duty, which has been delegated to the Joint Committee, to enforce the Food Safety Act 1990; the Official Food and Feed Controls (Wales) Regulations 2009 and a wide variety of other food / feed legislation including the Food Hygiene (Wales) Regulations 2006.
- 1.2 As part of the Food Standards Agency's Framework agreement the Councils are required to produce a Food Safety Service Plan setting out the arrangements in place to discharge these duties. This Food and Feed Law Enforcement Service Plan is produced in response to that requirement and is designed to inform residents, the business community of Bridgend, Cardiff and the Vale of the arrangements the Councils have in place to regulate food safety.
- 1.3 A copy of the draft Food & Feed Law Enforcement Service Plans for 2019/20 for the Shared Regulatory Service has been attached to this report as Appendix 1.
- 1.4 The Service Plan details how the Shared Regulatory Service will fulfil the major purpose of ensuring the safety and quality of the food chain to minimise risk to human and animal health.
- 1.5 To achieve this, the Councils will conduct inspections in accordance with the intervention programme, carry out investigations including dealing with complaints, provide advice/education and provide guidance on what the law requires, undertake sampling and take enforcement action where appropriate.
- 1.6 The plan details the demands on the service, the risk based work programme and the resources available to deliver the required work. As with many other Council services the service faces increasing demands with reducing resource.

- 1.7 The plan explains the Food Standards Agency expectations of Local Authorities, some of the achievements in 2018/19, and the challenges for the year ahead.

2. Key Issues for Consideration

- 2.1 The Food Standards Agency framework agreement sets out the expectations placed upon local authorities and their delivery of official controls on feed and food law. The agreement sets out the planning and delivery requirements of feed and food official controls, based on the statutory code of practice.
- 2.2 A requirement within the framework is that local authorities carry out interventions at all food hygiene, food standards and feeding stuffs establishment in their area at specified frequencies.
- 2.3 The Food Standards Agency has the power to inspect local authorities to determine the Council's performance against the standard.

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

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

4. Resources and Legal Considerations

Financial

- 4.1 The Participants' contribution towards the Shared Regulatory Service is recharged on a quarterly basis, based upon the approved budgets for 2019/20. Accounting for the full year is reported to the Committee at the Annual General Meeting.

Employment

- 4.2 There are no immediate employment implications associated with this report.

Legal (Including Equalities)

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

5. Background Papers

- Appendix 1 Draft Food and Feed Law Enforcement Service Plan

Shared Regulatory Services

Draft

Food and Feed Law

Service Plan 2019/20



Food Hygiene
and Standards



Shared
Regulatory
Services



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Introduction

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

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

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

Christina Hill
Operational Manager Commercial Services

1. Service Aims and Objectives

1.1 Aims and objectives

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

The overall aim of the Service is to:-

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

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

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

1.2 Links to Corporate Objectives and Strategic Plans

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



The following strategic priorities are particularly relevant to the delivery of the food and feed controls:-

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

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

Safeguarding the Vulnerable – The role of the food service plays a vital part in safeguarding the vulnerable, particularly in relation to educational and care homes settings. Good nutrition and safe food are essential to everyone’s short and long term health and wellbeing which is further enhanced in terms of vulnerable adults and children. The enforcement of food regulations ensures that food provided in these settings are safe, therefore protecting our vulnerable residents.

Supporting the local economy – The provision of timely advice and guidance on food safety and food standards legislation can benefit the economic viability of businesses. Failure of a food producer to correctly label foods can, for example lead to costly re-labelling of inaccurately described foods and it is essential for producers to be fully acquainted with the legislation that applies to their products and the hygiene standards they need to comply with when producing the food. The equitable enforcement of regulations helps to maintain a level playing field, allowing businesses to compete on equal terms.

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

- Protecting individuals from harm and promoting health improvement
- Ensuring the safety and quality of the food chain to minimise risk to human and animal health
- Promoting a fair and just environment for citizens and business
- Improving the local environment to positively influence quality of life and promote sustainability.

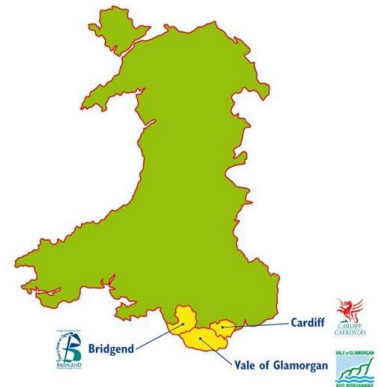
The Local Public Health (medium term) Plan 2018-2021 - Published as part of the Local Public Health Strategic Framework the Local Public Health Plan provides details of how local Public Health teams work in partnership to improve and protect the health and well-being of the local population. The Plan sets out several priority work areas and actions necessary to achieve improvement which the SRS Food and Feed Service contribute to through various activities. Priority areas identified in the Local Health Plan include:-

- | | | |
|--------------------|------------------|-----------------------|
| • Tobacco | • Healthy weight | • Alcohol |
| • Workplace health | • Immunisation | • Physical activity |
| • Falls prevention | • Healthy eating | • Health inequalities |
| • Sexual health | • Dementia | • Healthy environment |

2. Background

2.1 Area profile

Shared Regulatory Services covers the Council areas of Bridgend, Cardiff and the Vale of Glamorgan and serves over 600,000 residents. Extending from St Mellons in the east to Maesteg in the west, the area encompasses Cardiff, the capital City of Wales with its array of cultural, financial and commercial organisations and the rural areas of Bridgend and the Vale of Glamorgan with their vibrant tourist and agricultural economies.



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



140,000 residents. To the north of the M4, the area consists of mainly ex-coal mining valley communities with Maesteg as the main centre of population. To the south of the M4, the ex-market town of Bridgend is the largest town, the hub of the economy and its employment base. To the south west on the coast lies Porthcawl, a traditional seaside resort, with a high proportion of elderly residents, which is subject to a major influx of tourists during the summer period.

Cardiff is the capital city of Wales and is continuing to grow faster than any other capital city in Europe. In

population terms, it is the largest city in Wales with a population of 360,000. Measures of population however, belies Cardiff's significance as a regional trading and business centre. The population swells by approximately 70,000 daily with commuters and visitors. Cardiff is the seat of government and the commercial, financial and administrative centre of Wales. Cardiff boasts one of the most vibrant city centres in the UK and on a typical weekend, Cardiff's night time economy can attract over 40,000 people and sometimes more than 100,000 when the Principality Stadium hosts international events.



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



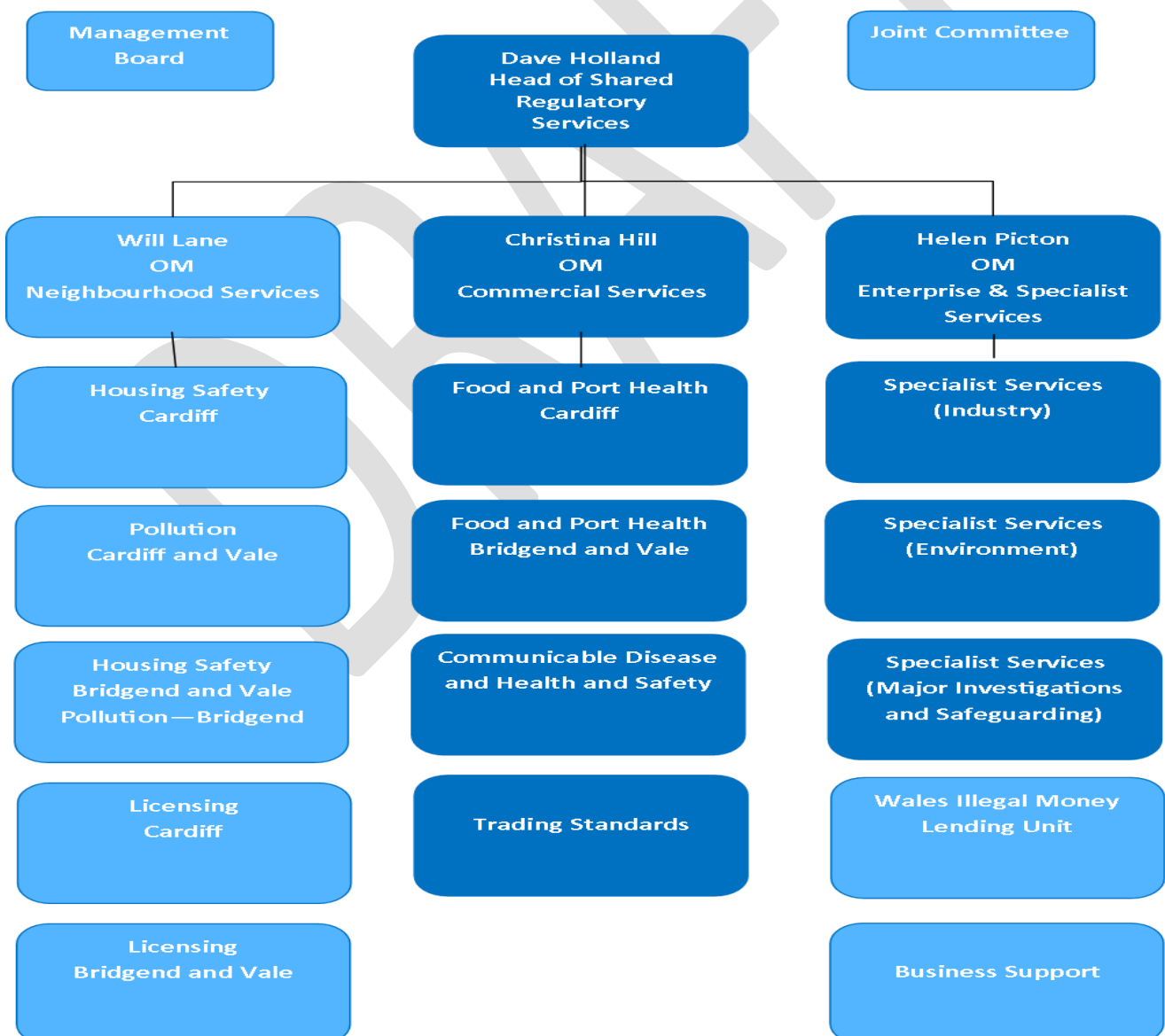
130,000 residents. The area is predominantly rural in character, but contains several urban areas of note such as Barry, Penarth, Dinas Powys and the historic towns of Cowbridge and Llantwit Major. Barry is the largest town, a key employment area and popular seaside resort. The rural parts of the Vale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

2.2 Organisational structure

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

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

Shared Regulatory Services Organisational Chart



2.3 Scope of the Food and Feed Service

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

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

Responsibility

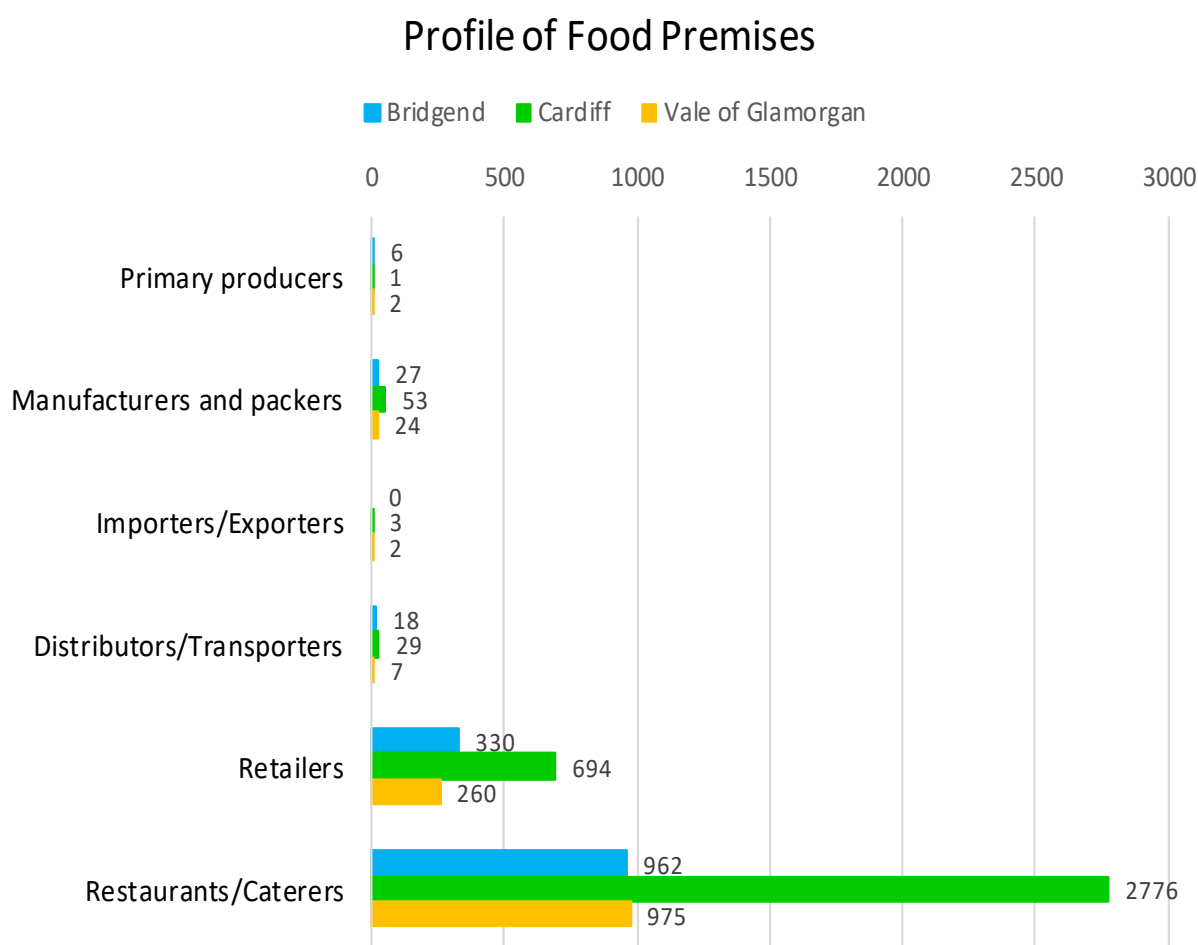
Responsibility for food safety activities is broken down as follows:-

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

2.4 Demands on the Food and Feed Service

2.4.1 Food Safety

The region has approximately 6169 food premises with Bridgend having approximately 1343 premises, Cardiff approximately 3556 premises and the Vale of Glamorgan 1270. All require a range of interventions. The following tables provide a profile of the food premises within the three areas by type. Food business operators must register their businesses with the food authority except where the establishment requires approval. Of the 6169 identified food businesses 16 are approved (3 Bridgend, 11 Cardiff and 2 Vale).



2.4.2 Feed Safety

Feed safety is a vitally important element of controlling food safety and this service takes a holistic view ensuring compliance from farm to fork; feed that is fed to animals eventually enters the food chain. The legislation requires that premises involved in the feed chain producing, trading in or using animal feed must be registered with local authorities; and those that manufacture complex feeds have to be specifically approved. The businesses described include livestock farms, livestock farms which mix using additives, arable farms that grow, use of sell crops for feed use, fish farms, surplus food suppliers i.e. businesses supplying food e.g. bread suitable for re-entering the feeding stuffs market, co-product producers e.g. a by-product of a manufacturing process such

as brewers grains which can be used in animal feed, transporters of feed, manufacturers of feeding stuffs including pet food, stores and distributors such as animal feed merchants.

The Feed Law Code of Practice re-issued in October 2014 requires that inspection of animal feed premises in line with a risk based approach. Bridgend and the Vale of Glamorgan are principally rural areas dominated by livestock farming and these businesses although high in number are primarily low risk feed premises. The high risk feed premises such as manufacturers, distributors and surplus food suppliers are situated within Cardiff and the larger towns of Bridgend and the Vale of Glamorgan.

This Plan would usually include details of the profile of feed premises across the region, however due to issues encountered with data retrieval, further details will be provided in due course and the appropriate approval sought.

2.4.3 Service delivery points

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

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Bridgend

Civic Offices
Angel Street
Bridgend
CF31 4WB

Normal offices hours:

Monday to Thursday: 8.30am to 5.0pm
Friday: 8.30 am to 4.30pm

Cardiff

Level 1
County Hall
Cardiff
CF10 4UW

Normal office hours:

Monday to Thursday: 8.30am to 5.00 pm
Friday: 8.30 am to 4.30pm

Vale of Glamorgan

Civic Offices
Holton Road
Barry
CF63 4RU

Normal offices hours:

Monday to Thursday: 8.30am to 5.00pm
Friday: 8.30am to 4.30pm

2.4.4 External Factors and emerging issues impacting on the Service

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

With this in mind the way in which food standards is delivered has required realignment to ensure the food standard programme is met in accordance with the Food Law Code of Practice. Following significant training of staff, food safety teams will begin to deliver some food standards services from September 2019. This new approach will result in inspections delivering both hygiene and standards matters ensuring businesses are compliant in all aspects of food safety and standards.

The Trading Standards team will continue to deliver a service in respect of food standards, however this will be a focused programme which will include high risk areas and take into account an intelligence led approach.

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

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

Increase in new food businesses - The prosperity and increasing popularity of the City of Cardiff means that the number of new food businesses attracted to the City is constantly increasing. In Cardiff alone during the last year a total of 540 new Food Hygiene businesses and 709 new Food Standards businesses were identified. This places a significant impact on resources of the Food Safety and Trading Standards functions, particularly as the Food Law Code of Practice requires new food businesses to be inspected, where possible, within 28 days of opening. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention. Businesses are deemed to be new businesses following the creation of new legal entities such as new limited companies, sole traders and partnerships and if the nature of business changes.

Import and export of products post Brexit – The uncertainty of the outcome of Brexit requires the SRS to keep abreast of the potential changes as they occur and be prepared for any eventuality. The biggest potential change will arise from the United Kingdom's status as a "Third Country" to those that remain within the EU and the countries within the EU will become "Third Countries" to the United Kingdom. This will require imported products of animal origin to go through a Border Inspection Post facility and any higher risk products not of animal origin to be imported through a Designated Point of Entry. Currently neither the ports nor airport in the SRS region possess either

of these statuses in relation to food, but it is anticipated that trade patterns may change in the future and potentially require an enhanced monitoring role for the SRS.

FSA Audit of the implementation and operation of the Food Hygiene Rating Scheme – The Food Standards Agency completed an audit of the arrangements for the implementation and operation of the Scheme across all 22 local authorities in Wales. The report was recently published in 2019 and has identified 13 recommendations and many examples of good practice in relation to the implementation and operation of the Scheme in Wales. There are a number of recommendations such as the Local Authority making a commitment to undertake all interventions in accordance with the frequency specified in the Food Law Code of Practice and the need to comply with Internal Monitoring Procedures which will be difficult to meet with the current staff resource dedicated to food safety. To address this, improvement of staff resource will have to be considered including the retention and recruitment of staff, utilisation of alternative interventions and the best use of existing resource. Dealing with these challenges means that other health promotion activities associated with food are likely to be limited, however when resources permit, we will support local initiatives that improve health and wellbeing.

Feed Law Enforcement - A series of Food and Veterinary Office (FVO) audit reports of Official Feed Controls in the UK (2009, 2011 and 2012) identified a catalogue of serious and persistent failings in some Councils in Wales. In April 2013, the Councils and the Food Standards Agency recognised that the changes considered necessary to improve feed law enforcement could not be made with the existing funding mechanism. Following extensive discussion between these parties, the problem was resolved by WG removing the funding for Official Controls on Feed from the RSG and making that available to be reallocated to the Welsh Councils (according to their workload) via the FSA Wales. The Regional Delivery Model proposed that each LA's work programme would be specified by FSA Wales and that LA's would invoice FSA Wales so that they could be remunerated for the work they carried out. This process has been in place for some years and the FSA have confirmed their intention to undertake an audit of the scheme in February 2020 and much work will be required to sufficiently prepare.

Major events - SRS plays an important role in the successful staging of major events across the three local authority areas. In addition to dealing with any licensing matters associated with a particular event, SRS plays an important role in ensuring that food sold at events is safely prepared and stored, and that it is labelled correctly. Major events staged through the participant Councils go through a detailed planning process via the respective Events Safety Advisory Group in Bridgend and the Vale of Glamorgan, and in Cardiff via the Events Liaison Panel. SRS plays a role throughout the planning stages with respect to food safety, health and safety and brand protection. While summer is traditionally the busiest time for events, June, July and August have been exceptionally busy. This is due in part to the success of the City of Cardiff Council in promoting itself on the world stage as the home of successful events. There is also a discernible increase year on year in the other two local authority areas, with figures for the Vale of Glamorgan area suggesting a 25% increase in events this year. Some examples of events recently staged include the Volvo Ocean Race, Oktoberfest, Welshfest and the various agricultural shows across the region. All of this has an impact on the Shared Service in terms of meeting demand from other areas of responsibility, and at a time of our diminishing staffing resource, in covering weekend and evening work. Discussions are underway with the respective partner councils to ensure that event work can be appropriately prioritised, for example through service level agreements, and measures put in place to recover cost where necessary.

Ensuring competency/Food Law Code of Practice –As anticipated the Food Law Code of Practice Wales (August 2018) has increased the required continual professional development from 10 to 20 hours for all food officers. This will require relevant adjustments to be made to the staff appraisal system “#its about me” and internal monitoring to ensure its effective implementation. Challenges will be posed by the ability to identify suitable courses for more experienced officers to participate in to further their personal development. It is hoped that annual membership of an online training provider for all officers charged with the delivery of the food service will meet this need. In addition the amended Food Law Code of practice details competencies that Lead Food Officers, Authorised Officers and Regulatory Support Officers must meet in order to fulfil the role for the Food Authority. The Food Standards Agency intend to issue guidance on how these should be met which is awaited prior to a review of authorisations for each individual being undertaken.

Retention of staff – The SRS is undergoing another significant period of change; the functions we deliver for our partner councils are attracting new demands. Recruitment and retention of good officers remains a challenge; we need to ensure the SRS meets existing targets but is nimble enough to meet future agendas for public protection.

The shortage of applicants with the right skills, abilities and experience in the different professions has created a more competitive market. These shortages, attributable to an aging professional demographic, increasing turnover due to retirement and a reduced investment in sponsorship of students by the Councils, have to be addressed if we are to deliver effective regulatory services. We know that the majority of our officers are content with their employment within the SRS, yet the SRS delivery model is at significant risk due to the inability to attract, recruit and retain a high calibre.

In 2019, the SRS will build upon its’ Workforce Plan by implementing a strategy that seeks to sustain and motivate the workforce. Reflecting observations from stakeholders and the recommendations put forward by audits, e.g. FSA, WAO, The intended outcomes of this strategy are that:

- The SRS will be able to recruit high calibre individuals and experienced professionals to ensure the provision of high quality regulatory services across the region.
- The SRS will manage talent effectively to be able to respond speedily and effectively to necessary changes.
- SRS officers will be able to work effectively in their roles and find their working life to be an enjoyable and rewarding experience.

Mobile Working Solutions – An essential component of the operating model for SRS was the introduction of technical and mobile working solutions that enable employees to work remotely. This has contributed to the success of the service, but as agile working becomes the norm the service is finding the technology deployed is becoming outdated after only 2/3 years. As technology improves, better facilities now exist which could further enhance the work of SRS and its remote working capabilities. SRS will work with ICT to explore options for improving equipment and systems to ensure that we deliver services both efficiently and effectively.

Delivering with less – Environmental Health Services Follow up Review – As part of his ‘delivering with less’ series of Local Government Improvement Studies, the Auditor General published his report – Delivering with less – the impact on environmental health services and citizens, in October 2014 which contained a number of recommendations for local authorities. In January 2018, the Auditor General set out his intention to follow up on this report to determine the extent

these recommendations have been addressed. SRS has a role to play in these assessments across all three partner councils has assisted auditors in their review across the three councils. It is anticipated that despite challenging financial pressures, SRS will be able to demonstrate a successful change programme and strong links to national and corporate priorities.

Impact of the new molecular diagnostic techniques used by Public Health Laboratories - Since June 2018 SRS has seen a considerable rise in the number of confirmed cases of significant pathogens such as Giardia; Shigella and Cryptosporidium due to the introduction of the new molecular testing methods in microbiology laboratories used by the service. This trend has also been observed in the number of confirmed Campylobacter cases; particularly in Bridgend and Cardiff. The new (PCR) testing regime is more sensitive than traditional methods (culturing bacterial colonies in a petri dish) since it will detect any genetic material of the pathogen from faecal samples; whether this genetic material is current or historical. The PCR testing is additionally detecting an increasing number of positive E.coli VTEC results, which are notifiable to the Authority, and potentially indicate a possibility of E.coli O157 VTEC infection. Until the faecal sample has been cultured using traditional petri dish methods, these cases must be treated as positive E.coli O157 cases and responded to in accordance with pre-determined Local Authority response times. This will often mean carrying out more detailed interviewing; obtaining faecal samples from close contacts and excluding cases working with food or vulnerable people from their work. However, the experience of SRS during 2018 is that these cases are often found to be non-O157 infections once cultured, and would consequently require a much less robust response from Officers.

Developing Competence of Food Safety Officers to Address Food Standards Interventions- During the last financial year a training programme was designed to develop the competence of food safety officers in order to undertake food standards inspections. The aim of this new way of working is to maximise the use of resources, by enabling food safety officers to complete the food standards intervention at the same time as the food safety inspection of low risk food standards businesses. The validation process has begun to ensure officers are competent in this new area of work. A regular review period will be required to evaluate the impact relating to this area of work.

Increase in enforcement action by the service –The impact of enforcement action required as a result of the aforementioned FSA audit report has seen a vast increase in investigations conducted by the department. The FSA requested that a report be considered for prosecution for every premise issued with a Food Hygiene Rating of zero or for every voluntary closure issued. The volume of work required for preparation of such reports should not be underestimated. As a result of the aforementioned process change last financial year saw a vast increase in the number of investigations initiated. It should be noted that whilst officers are conducting the investigations the numbers of inspections conducted are reduced which further impacts on delivery of the programme of inspections.

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

demonstrates that compliance with the associated legislation remains a challenge for the service. Further survey work is planned for this financial year to target this area of work.

Food Fraud – Food fraud is a crime that is an emerging risk given the complexity of global food supply chains. Food fraud is estimated to cost the UK food and drink industry up to £11 billion per year. Food fraud also has the potential to be a major food safety issue – an extreme example of this is fake alcohol. Economic decline has resulted in an increase in food fraud with unscrupulous traders endeavouring to save money by placing food on the market that fails to meet food safety requirements and poses a risk to public health. Generally, premium food and drink is the most common target, but the horsemeat scandal was an example of fraud in food that was low-priced but mass-produced. And while adulteration and substitution tend to grab the most headlines, there are many complex forms of food fraud emerging. It is important that officers are kept up to date with emerging trends and have the relevant skills to identify and act on such issues.

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

2.5 Enforcement Policy

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

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

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

The Regulators Code is based upon six broad principles:

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

3. Service Delivery

3.1 Interventions at Food and Feeding Stuff Establishments

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

3.1.1 Food Hygiene Interventions

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

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

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

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

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

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

Proposed food hygiene interventions 2019/20

A – C Rated Food Businesses

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

90% of C rated food businesses due an intervention this year are targeted to receive either a full inspection or a verification visit if the business is broadly compliant and has a food hygiene rating of 5.

D rated food businesses

D rated food establishments can alternate between a full inspection and a non official control e.g. an information gathering visit using a questionnaire. No new risk rating or food hygiene rating score is permitted from a non official control.

If at the time of the information gathering visit there is concern that the level of food safety has deteriorated, or the food operation has changed, then the intervention will be referred to a competent officer for a full inspection.

E rated food businesses

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

For 2019/20 the service will continue the use of an alternative enforcement strategy for E rated food establishment utilising students who have undertaken the Food Safety module either at degree or masters level.

Inspection of New Businesses

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

Cardiff has a high turnover of business ownership which presents a challenge for the Food and Port Health Team over and above the routine inspection programme. During 2018/19 540 new premises were identified in Cardiff and 151 in both Bridgend and the Vale of Glamorgan.

Issues are encountered across the three areas due to unnecessary resources being spent on visiting new businesses that fail to open for trade on their initial specified date. This has a subsequent adverse effect on the ability to complete the inspection within 28 days of the programmed inspection date.

Food Hygiene Revisits

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

Inland Imported foods

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

Port Health Functions

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

Currently neither the Port of Barry nor Cardiff International Airport are Border Inspection Posts or Designated Points of Entry and there is no importation of food products of animal origin or feed or high risk foods not of animal origin. Potentially all ports provide an entry point for food stuffs within and outside the EU and as such the Service carries out a range of health controls enforcing regulations on behalf of central government.

In the meantime however, the Service will continue to monitor food produced for and delivered to aircraft, inspect aircrafts and respond to reports of illness on board in accordance with International Health Regulations, inspect ships at the ports of Cardiff and Barry either at the request of a shipping agent to issue Ship Sanitation Certificates or as part of a planned inspection.

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

Programmed Interventions for 2019/2020

The table below illustrates the risk ratings of premises, the intervention frequencies and the total number of interventions to be delivered during 2019/20.

Food Safety Intervention Plan 2019/20					
Risk Category	Intervention frequency	Number of Interventions due at start of year (Including any backlog)			
		Bridgend	Cardiff	Vale of Glamorgan	
HIGH RISK	A	6 mths	8	38	2
	B	12 mths	56	209	83
	C	18 mths	395	1099	333
	High Risk Total		459	1346	418

MEDIUM-LOW RISK	D	2 years	128	358	122
	E/AES *	3 years	109	378	173
	Medium to low Risk Total		237	736	295
NEW BUSINESSES	Unrated (New business identified at 1 April o/s from 18/19)		12	89	11
	Unrated (New business identified and inspected during course of year)		Est 139	Est 451	Est 140
	Unrated total (Estimate based on 2018/19 no. identified)		151	540	151
REVISIT	Revisits (Estimate based on 2018/19 actual undertaken)		47	271	47
TOTALS			894	2893	911

Source: Planned Inspection Monitoring Programme

Food Safety Projects

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

Shared Regulatory Services intends to complete a survey of food businesses with 0-2 ratings across Bridgend, Cardiff and Vale of Glamorgan to check that the current food hygiene rating is being displayed in an appropriate place.

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

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

Ice survey - A Wales wide sampling survey was undertaken in 2017 to 2018 to analyse the microbiological quality of ice in coffee shops, and found that from 164 samples 23.8% (39) were unsatisfactory. A BBC Survey also recently found drinks from cinemas contained unacceptably high levels of bacteria. The service has therefore decided to extend the survey to determine the microbiological quality of ice used to cool drinks in other businesses not sampled from across Shared Regulatory Services ensuring suitable remedial measures are taken where unsatisfactory samples are found. Approximately 40 samples are hoped to be obtained.

Shopping Basket Survey - The Welsh Food Microbiological Forum annually provide a list of food products to be sampled that have an emerging or identified risk. Participation by the local authorities in this survey helps to identify non-compliant foods for intelligence data gathering and action to be taken against securing food safety. Approximately 40 samples are hoped to be obtained for further action to be considered as appropriate.

Food Safety Training Expansion - SRS has recently expanded its training offer to business and now runs HACCP courses. HACCP is a fundamental part of the Food Safety Management System for most businesses and feedback from the pilot dedicated HACCP training courses was excellent. As a further development in its training portfolio going forward, SRS will soon be providing an accredited Level 2 Allergens Awareness course for food businesses

3.1.2 Food Standards Interventions

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

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

The Service uses the food code of practice as a risk assessment model and the Food Safety Act. Work was undertaken during last financial year to ensure all areas are using the same assessment model ensuring a harmonised approach.

Food standards premises are divided into three categories namely high, medium and low. The Food Standards Code of Practice indicates that high risk premises are inspected every 12 months, medium risk premises are inspected every 24 months and low risk premises could be subject to an alternative enforcement strategy at least once during any 5 year period. Some establishments which undertake food activities do not meet the definition of a food business establishment and therefore fall outside of the scope of Regulation (EC) No 852/2004. These premises do not carry a food standards risk rating however they do remain subject to the provisions of the Food Safety Act 1990 and Regulation (EC) No 178/2002

High risk businesses

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

Medium to low risk businesses

Previously the service has not been able to fulfil its obligations in relation to the completion of medium and low risk inspections due to limited resources within the Trading Standards Service. It is hoped that the new way of working in respect of food standards will demonstrate an enhanced completion of the food standards programme due to food safety officers conducting food standards inspections in conjunction with the food hygiene programme. This new way of working is due to commence in September 2019 with regular review periods to ensure its success. It is however difficult to anticipate percentage target for inspection of these premises at present. Food

safety officers are directed to complete food standards interventions at the same time as food hygiene, it is hoped that during 19/20 medium and low premises will reach at least a 50% completion rate with an enhanced progression for 20/21.

New business

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

Cardiff has a high turnover of business ownership which presents a challenge over and above the routine inspection programme. During 2018/19 709 new premises were identified in Cardiff. In Bridgend 172 new premises were identified and 173 in the Vale of Glamorgan.

Issues are encountered across the three areas due to unnecessary resources being spent on visiting new businesses that fail to open for trade on their initial specified date. This has a subsequent adverse effect on the ability to complete the inspection within 28 days of the programmed inspection date.

Food Standards Revisits

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

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

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

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

Food Standards Intervention Plan 2019/20

Risk Category	Intervention Frequency	Number of Interventions due at start of year (including any backlog)		
		Bridgend	Cardiff	Vale of Glamorgan
High Risk	12 mths	5	20	4
Medium Risk	24 mths	A new inspection regime is due to be undertaken from September 2019. As this is a new way of working we are unable to provide an exact figure for this table.		
Low risk	60 mths			
New business	Estimate based on 2018/19 no. identified	172	709	173
Re-visits	Estimate based on 2018/19 undertaken	4	17	5
Total		177	729	177

Food Standards Projects

SRS will participate in a number of regional projects agreed by the Glamorgan Group (GG) which include the following:

- Due to the high level of complaints and concerns around the safeguarding of children a project will be undertaken examining products claiming to contain cannabis (Cannabis lollies) and other food claiming to contain Cannabidiol (CBD). CBD is considered by the European Commission as a Novel Food:



“Novel Food is defined as food that had not been consumed to a significant degree by humans in the EU before 15 May 1997, when the first Regulation on novel food came into force.”

Novel foods require an application to EU Authorities which undergoes a scientific risk based assessment by the European Food Safety Authority EFSA

Novel food requirements are:

- No risk to public health
- Not nutritionally disadvantageous when replacing a similar food
- Not misleading to a consumer

The EU maintains a searchable database list of all novel foods in Cannabidiol is listed under ‘cannabinoids’ and the entry for CBD in the catalogue confirms that CBD foods are

by definition a Novel Food and should be subject to Novel food regulation whereby a novel food application is required.

- SRS are also carrying out further surveys that are highlighted on the sampling plan and include:
 - Allergens at sandwich makers and deli catering
 - Allergy information in food delivery services
 - Fish speciation. Chip shops and catering establishments
 - Fresh meat Claims
 - Colours, descriptions and allergens at takeaways.
 - Heavy metals in herbal teas and drinks made with exotic leaves and flowers at Chinese supermarkets
 - Claims relating to vegan and vegetarian of packaged foods
 - Claims relating to “extra lean “
 - Complaint sampling as and when required.

3.1.3 Feed Hygiene Interventions

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

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

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

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

Risk to Animal/Human Health and/or Other Businesses

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

Extent to Which the Activities of the Business Affect any Hazard

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

Ease of Compliance

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

Animals and People at Risk

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

Level of (Current) Compliance

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

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

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

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

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

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

High risk business

In line with the risk assessment process high risk premises require an annual inspection, owing to the potential risks to the feed chain. On the whole the manufacturing of animal feed, feed additives, anti-toxicants, proteins or compound feeds have higher risk factors in the risk assessment. Within SRS there are very few of these type of premises in operation. Currently the number of Category A – High Risk banded premises is very low with only 5 premises registered.

Medium to low risk business

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

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

Feed Safety Re-visits

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

New Businesses

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

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

However there has been an increase in the number of new feed businesses particularly micro breweries who sell on waste grains as animal feed. In 2018/19 16 new businesses were identified in Bridgend, 5 in Cardiff and 13 in the Vale of Glamorgan.

Feed Safety Intervention Plan

This Plan would usually include details of the Feed Safety Intervention Plan for the forthcoming year, however due to issues encountered with data retrieval, further details will be provided in due course and appropriate approval sought.

3.2 Food and Feed Complaints

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

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

It is estimated that for the period 2019/20 the following numbers of complaints could be received.

Complaint type	Bridgend	Cardiff	Vale of Glamorgan
Food Hygiene	102	335	56
Food Complaints	21	71	13
Food Standards	25	140	44
Feed Safety	0	0	0

3.3 Home Authority Principle and Primary Authority Scheme

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

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

Since October 2017, amendments to the Regulatory enforcement and Sanctions Act brought some significant changes to the Primary Authority scheme which has broadened the scope for SRS to enter into PA partnerships. As a result of this, some existing Primary Authority Partnerships in England now require additional support for Welsh Devolved matters so that businesses trading in Wales in sectors such as food, public health, agriculture, environmental protection, pollution control, and housing need to have a Welsh Primary Authority partner to issue assured advice in Wales. SRS is currently supporting 9 of our 30 partnerships in this new capacity to ensure continued Primary Authority coverage in Wales which includes some 'big names' in the retail and other sectors with a number of other prospective Welsh partnerships in the discussion phase.

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

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

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

3.4 Advice to business

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

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

3.5 Food and Feed Sampling

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

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

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

Food Hygiene Sampling

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

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

Food Standards Sampling

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

An area of growing concern surrounds the declaration and the cross contamination of allergenic ingredients in takeaway dishes. There have been a number of well publicised cases in the media that have highlighted the dangers of eating unsafe food sometimes with fatal consequences. In the last two years priority has been given to sampling products from takeaway premises to

establish the presence of undeclared allergens and this work will continue alongside an educational programme aimed at smaller retail premises to increase compliance.

SRS will continue to support operation OPSON a global initiative jointly coordinated by Europol-INTERPOL focusing on counterfeit and substandard food, and the organized crime networks behind this illicit trade. In the UK activities are co-ordinated by the National Food Crime Unit (NFCU) and the Food Standards Agency (FSA). SRS will focus on the supply of food supplements containing banned ingredients (DNP and DMAA) from on line sellers and gyms within the Local Authority.

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

Feed Hygiene Sampling

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

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

This Plan would usually include details of the Sampling Plan for the forthcoming year, however due to issues encountered with data retrieval, further details will be provided in due course and appropriate approval sought.

3.6 Control and investigation of outbreaks and food related infectious disease

All cases of communicable disease are investigated and full details of this work are outlined in the Communicable Disease and Health Protection Plan 2019/20. This includes the investigation of notified confirmed and suspected cases and outbreaks of food poisoning and food borne disease. These investigations are supported by reactive inspections of food businesses, food, water and environmental sampling of implicated premises and proactive delivery of bespoke training.

In relation to outbreaks, SRS follow the Wales Outbreak Plan 2014 (*currently under review*) which lays out the approach for managing all communicable disease outbreaks, including food poisoning, and is followed by all 22 local authorities in Wales in partnership with Public Health Wales and Food Standards Agency. The Plan is overseen by the Welsh Government and prescribes the manner in which outbreaks are identified, managed and controlled.

The Plan requires designation of a named Lead Officer for Communicable Disease for each local authority. Within SRS these are:

- Bridgend Angela Clack
- Cardiff Allyson Jones
- Vale of Glamorgan Sarah Swaysland

This designation does not imply exclusivity. To ensure a prompt response and a timely investigation any of the 3 Lead Officers together, CSOs or CSTOs in the Communicable Disease, Health and Safety Team respond to and investigate suspected and confirmed cases throughout the 3 local authorities.

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

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

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

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

recycling (where the bacteria becomes splashed onto adjacent surfaces and subsequently transferred onto hands, ready-to-eat foods or other equipment).

Campylobacter remains an important public health risk. The pathogen has multiple risk factors in addition to having a low infective dose, meaning that a person only needs to be exposed to a small amount of the bacteria to become ill. It is therefore critical that the communicable disease service retains the requisite level of resource to be able to effectively investigate all confirmed cases in a timely manner.

All cases notified to the Service are contacted and interviewed primarily by phone and occasionally by face to face interview. Interview questions relate to exposures within the 10 days prior to the onset of illness and include clinical and demographic information, food history and environmental exposures, foreign and domestic travel, and with regard to chicken domestic food preparation and purchasing practices and commercial dining locations. A full report on the risk factors associated with Campylobacter Infection in Bridgend, Cardiff and the Vale of Glamorgan in 2018 can be found in the Communicable Disease and Health Protection Service Plan . 2019/2020

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

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

Based on previous year's demand, it is estimated that the team will undertake the following investigations during 2019.

Communicable Disease Intervention Plan 2019			
Type	Number of Interventions estimated at start of year based on those received in the previous year (2018)		
	Bridgend	Cardiff	Vale of Glamorgan
Total No. of food poisoning notifications	322	790	277
No. of outbreaks	14	30	11
Total	336	820	288

The above figures are based on previous years demands only.

3.7 Feed/Food Safety Incidents

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

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

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

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

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

3.8 Liaison with other organisations

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

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

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

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

3.9 Food and Feed Safety Promotion

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

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

4. Resources

4.1 Financial allocation

The estimated financial expenditure on food and feed safety for 2019/20 is demonstrated in the following table. Legal charges are part of a central recharge and cannot be separately calculated. Investment in and renewal of information technology assets is funded centrally following a bid process based on the development of a business case.

	Budget 2017/18	Budget 2018/19	Budget 2019/20			Total
	Bridgend Cardiff Vale of Glamorgan	Bridgend Cardiff Vale of Glamorgan	Bridgend	Cardiff	Vale of Glamorgan	
Staffing	3,103,230	3,196,240	644,090	1,797,968	577,142	3,019,200
Travel / Subsistence	63,710	60,870	13,399	36,665	12,006	62,070
Sampling	87,050	87,170	16,006	42,362	14,342	72,710
Supplies and services	216,870	161,221	30,761	81,815	27,564	140,140
TOTALS	3,470,860 This figure relates to the entirety of the teams involved in food. This figure does not reflect the allocation to food only.	3,505,501 This figure relates to the entirety of the teams involved in food. This figure does not reflect the allocation to food only.	704,256	1,958,810	631,054	3,294,120 This figure relates to the entirety of the teams involved in food. This figure does not reflect the allocation to food only

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

4.2 Staffing allocation

The table below summarises the estimated staff demand identified for the core functions within the Food and Feed Service. Staff numbers are shown in terms of full time equivalent posts (FTE).

Function	Bridgend		Cardiff		Vale		Total [FTE]
	Food Safety	Food Stds	Food Safety	Food Stds	Food Safety	Food Stds	
Premises Interventions	5.5	0.4	13.5	1.1	5.5	0.4	26.4
Food & Feed Hygiene Complaints	0.75	0.01	1.9	0.1	0.75	0.01	3.52
Home/Primary Authority	0.15	0.1	0.5	0.5	0.15	0.1	1.5
Advice to Business	0.5	0.1	1	0.4	0.5	0.1	2.6
Food and Feed Sampling	0.40	0.65	0.9	1.15	0.40	0.65	4.15
Food Poisoning	0.2	0	1	0	0.2	0	1.4
Food and Feed Safety Incidents	0.15	0.05	0.47	0.55	0.15	0.05	1.42

Liaison	0.08	0.03	0.27	0.05	0.08	0.03	0.54
Food & Feed Safety/ Standards Promotion	0.2	0.01	0.9	0.05	0.2	0.01	1.37
Management	0.72	0.22	1.55	0.44	0.72	0.22	3.87
Total Professional	8.65	1.57	21.99	4.34	8.65	1.57	46.77
Administration	2	0.18	4.25	0.35	2	0.18	
Overall totals [FTE]	10.65	1.75	26.24	4.69	10.65	1.75	55.73

The tables below indicate the actual number of staff working on Food and Feed safety and related matters (in terms of full time equivalents FTE) at 1st April 2019. There are a number of vacancies within the Food Service where recruitment has begun. The total across Food and Feed Standards is 42.455 FTE. Levels of qualification are expressed with reference to the appropriate Food Safety Act Food Law Code of Practice and Practice Guidance and Feed Law Code of Practice, including support staff.

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

Food Safety					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
Head of Shared Regulatory Services	Management of Environmental Health, Trading Standards and Licensing functions	Trading Standards Officer	0.02	0.06	0.02
OM Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	Diploma in Trading Standards (DTS)	0.075	0.15	0.075
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.02	0.04	0.02
Team Manager (Food and Port Health)	Food safety management and liaison.	Environmental Health Officer (EHORB registered, competent to inspect all categories)	0.46	1.00	0.46
Team Manager (Health & Safety and Communicable Disease Team)	Community Health including food poisoning and liaison	Environmental Health Officer(EHORB registered)	0.05	0.1	0.05

Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.1	0.2	0.1
Commercial Services Officers (Food and Port Health)	Food safety inc. 2 FTE for Port Health	Environmental Health Officer	3.9	8.1	3.9
Commercial Services Officers (CD)	Community health (food poisoning and infection control)	Degrees in in Environmental Health or equivalent science	0.1	0.50	0.2
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Environmental Health Officers & Trading Standards Officers	0.75	1.5	0.75
Technical Officer (Food and Port Health)	Food safety and port health	Degrees in in Environmental Health or equivalent science	0.8	2	0.8
Technical Officer (CD)	Community health including food poisoning	Degrees in in Environmental Health or equivalent science	0.1	0.80	0.2
Commercial Services Officer (Business Engagement and Training) industry	Food Safety & Food Standards at Manufacturing/Industrial Premises	Ordinary & Higher Certificates in Food Premises inspection, Higher Certificate in Food Control	0.25	0.5	0.25
		Total Professional staff	6.625	14.95	6.775
Administrative support			1.75	3.75	1.75
		Totals	8.375	18.70	8.525
		Overall Total (FTEs)	35.6		

There is an estimated shortfall of 3 FTE's needed to deliver the full Food Safety programme in accordance with the Food Law code of Practice and participate in all surveys with other local authorities. This is in addition to the need to fill vacancies within the service.

Food Standards					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
OM Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	Diploma in Trading Standards (DTS),	0.05	0.1	0.05
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.02	0.04	0.02

	Environment Team (Feed Hygiene)				
Team Manager (Trading Standards)	Management of Commercial Services Trading Standards Team includes Food Standards and Feed Hygiene functions.	Diploma in Consumer and Trading Standards	0.05	0.2	0.05
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.1	0.1	0.1
Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).		1.6	0.8
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Environmental Health Officers & Trading Standards Officers	0.25	0.5	0.25
Technical Officer (Trading Standards)	Food standards and feed hygiene functions	DCATS Food and Agriculture module or equivalent.	0.8	0.8	
		Total Professional FTE	1.27	3.34	1.27
Administrative support	.		0.02	0.02	0.02
		Overall total	1.29	3.36	1.29
		Overall Total (FTEs)	5.94		

There is shortfall of officers to meet the Food Standards inspection programme in accordance with the Food Law Code of Practice based on the same number of premises for Food Standards and Food Safety. It is recognised however, that such an increase in the number of Officer's required within this area is not financially viable for the service and consequently Officers enforcing Food Safety were provided with training enabling them to enforce Food Standards legislation. This will enable a multi skilled approach to the enforcement of food during 2019/20. In relation to high risk premises and referrals for non-compliances for the purpose of Food Standards, enforcement will remain with the Trading Standards teams. This would result in an estimated shortfall of 2 FTE's needed to deliver the full Food Standards programme in accordance with the Food Law code of Practice and participate in all surveys with other local authorities.

Feed Safety					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.01	0.02	0.01

	(Feed Hygiene)				
Team Manager (Trading Standards)	Management of Commercial Services Trading Standards Team includes Food Standards and Feed Hygiene functions.	Diploma in Consumer and Trading Standards	0.0025	0.015	0.0025
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.01	0.01	0.01
Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).	0.025	0.05	0.025
Team Manager (Environment)	Management of Animal Health and Welfare Team	BSc,	0.05	0.05	0.05
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Environmental Health Officers & Trading Standards Officers	0.05	0.05	0.05
Sampling Officer (Food)	Sampling	Advanced Certificate in Food Hygiene	0	0	0
Technical Officer (Trading Standards)	Food standards and feed hygiene functions	DCATS Food and Agriculture module or equivalent.	0	0	0
Animal Health & Welfare Officer	Feed hygiene on farm including sampling	Competency achieved through training, monitoring and assessment (officer to complete CoC in Agriculture 2017).	0.05	0.10	0.05
Animal Health & Welfare Officers	Feed hygiene on farm including sampling	Competency achieved through training, monitoring and assessment	0.10	0.025	0.10
	.	Total Professional FTE	0.2975	0.32	0.2975
Administrative support included with food hygiene					
		Totals			
		Overall Total (FTEs)	0.915		

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

4.3 Staff Development Plan

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

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

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

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

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

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

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

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

5. Quality Assessment

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

Documented procedures

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

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

Assessment and audits

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

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

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

Customer consultation and feedback

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

6. Review

6.1 Review against the Service Plan

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

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

6.1.1 Review of Food Hygiene Interventions 2018/19

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work and performance. The following sections identify those planned interventions due at the beginning of 2018/19 for Food Hygiene and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions, together with those that were actually undertaken and the overall % achievement. It should be noted that the programme changes throughout the year as businesses close and new businesses open. The percentage achieved therefore relates to performance at the end of the year as the programme has developed.

Food Hygiene Intervention Plan 2018/19										
Risk Category		Number of Interventions due at start of year (including any backlog)								
		Bridgend			Cardiff			Vale of Glamorgan		
		Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year
HIGH RISK	A	8	11	100%	36	25	100%	2	7	100%
	B	69	65	100%	236	200	100%	71	67	100%
	C	411	324	89.26%	979	621	77.04%	329	261	92.55%
	High Risk Total	488	400	90.90%	1251	846	82.06%	402	335	94.10%
MEDIUM-LOW RISK	D	103	31	32.29%	261	71	31%	114	39	40.21%
	E/AES*	85	61	91.04%	113	70	88.61%	101	63	85.14%
	Medium to low Risk Total	188	92	56.44%	374	141	45.78%	215	102	59.65%
NEW BUSI	Unrated (New business at 1 April)	0			5			1		

	Unrated (New business identified during year)	Est 195	139	92.05%	Est 556	451	83.52%	Est 178	140	92.72%
	Total unrated	195	139	92.05%	561	451	83.52%	179	140	92.72%
REVISIT	Re-visits	Est 28	47	N/A	Est 348	271	N/A	Est 42	47	N/A
TOTALS		899	678		2534	1709		838	624	

High Risk Food Business (A – C Rated)

The number of inspections carried out during 2018/19 failed to reach the levels of 2017/18 which saw the best results achieved by SRS in relation to the number of inspections carried out at high risk food premises. Notwithstanding this, 100% of A and B rated premises were carried out across the 3 areas during 2018/19, while the C rated premises saw a drop from the previous year. This was due to several reasons including vacancies within the team that impacted on performance and that in previous years contractors have been employed to meet inspection targets. It was also impacted, particularly in Cardiff, by the introduction of a policy to instigate an investigation into all business rated a zero or which have been closed due to poor standards in order to determine if further legal action was warranted. Despite this, 1581 programmed inspections to high risk premises were undertaken across the region as part of the programme.

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

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

D and E rated food businesses

Due to the need to prioritise high risk food premises, as a result of the large number of vacancies within the team, the inspection of low risk businesses (rated D-E) saw a decrease in results from 2017/18. This resulted in only 56.44% of medium to low risk inspections being carried out in Bridgend, 45.58% in Cardiff and 59.65% in the Vale of Glamorgan, As indicated previously this is due to the large number of vacancies within the team which impacted on resources and the ability to carry out all programmed inspections. The shortfall relates in the main to D rated premises due to the prioritisation of the high risk businesses for inspection. The number of the E rated businesses subject to an intervention was higher than that for the D rated businesses due to the ability to subject them to an alternative enforcement questionnaire. This required less resources due to the ability to complete them without actually visiting the business and the ability to use staff other than fully qualified food safety officers.

Inspection of New Businesses

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

Cardiff has a high turnover of business ownership which presents a challenge for the service, over and above the routine inspection programme. During 2018/19 a total of 842 new premises were identified across the region, with 540 of these being in Cardiff representing a massive 64% of new businesses across the three areas. In Bridgend and the Vale of Glamorgan 151 new premises were identified in each area. Notwithstanding this, the service inspected 92.05% premises in Bridgend, 83.52% in Cardiff and 92.72% in the Vale of Glamorgan. Attaining the target was also confounded by businesses not opening at initial date intended.

Food Hygiene Revisits

Inspection of food businesses often requires follow up visits to ensure compliance with food safety requirements. The intervention and revisit procedure requires that all businesses rated 0 are revisited within 28 days and all those rated 1 or 2 are revisited within 3 months. The number of revisits is difficult to forecast however an estimate is made based on the actual number carried out in the previous year. This resulted in an increase in the actual number undertaken during 2018/19 in both Bridgend and the Vale of Glamorgan who both undertook 47 re-visits, while the number in Cardiff dropped to 271 from an estimated 348.

Broadly Compliant Premises

The number of food businesses with a food hygiene rating of more than 3 increased in each authority area during 2018/19 from the previous year. (Bridgend from 96.69% to 97.52%, Cardiff 92.71 % to 94.54%, Vale of Glamorgan 95.40% to 95.92%). The results show a positive upward trend, year on year, exceeding targets and highlighting the growing number of businesses that are improving their standards. This translates to an additional 83 premises in Bridgend, 131 in Cardiff and 55 in the Vale over the last 2 years achieving a satisfactory rating, some of which can be attributed to the success of the intervention programme for food businesses. That programme ensures that any food safety issues identified are followed up by either enforcement, advice or training and subsequently revisits to ensure compliance with food safety law. Furthermore the positive impact of Food Hygiene Rating Scheme encourages businesses to strive for a better rating.

Appeals

The size and scope of SRS means that the number of appeals received by the service against the Food Hygiene Rating awarded to a business is considerably higher than the rest of Wales. Dealing with these matters can be resource intensive and consequently impacts on the capacity of team managers. During the last year SRS has received 29 appeal applications consisting of 6 in Bridgend, 16 in Cardiff and a further 7 in the Vale of Glamorgan.

Inland Imported foods

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

Food Safety Projects

In addition to routine inspections of food businesses, SRS participated in a number of planned food safety surveys which entail various sampling programmes across a range of businesses. These included:-

Shopping Basket Survey - The Shopping Basket survey was set up by the Welsh Food Microbiological Forum to test 10 different food types to consider their microbiological safety. Food types include pate, cakes, salad, meat, coleslaw, smoked fish, cheese, fruit and spice. This survey was undertaken in Cardiff where 95 samples were taken. Where foods return as unsatisfactory or borderline, re-sampling takes place to see if the issues are a one off, or whether there may be an ongoing issue. Letters are sent to the branch, primary authority and head office, where applicable and to the manufacturers of failed products. Where issues are possibly localised, for example, temperature issues or issues with self-service then they are referred for investigation. In total 7 samples returned as borderline and 4 returned as unsatisfactory, all of which have been re-sampled.

Ice Survey - The Ice survey was a follow up from previous surveys focusing on the microbiological safety of ice in coffee shops with the focus this time being on leisure and licensed premises. Samples were taken from any ice machines, bagged ice or ice buckets. 33 samples were taken across Cardiff and the Vale of Glamorgan and 9 returned as unsatisfactory. All have been resampled and investigated with 3 ongoing cases. Further testing of 20 premises within the Cardiff region and 10 in each of Bridgend and Vale is planned for 2019/20 as part of a focussed ice compliance survey.

Nozzle-Dispensed Cream Survey - This survey focused on nozzle dispensed cream in an SRS designed survey that collected samples from across Cardiff and the Vale of Glamorgan. In total 14 samples were taken however 4 returned as borderline. These were resampled and investigated to gain microbiological safety of the products.

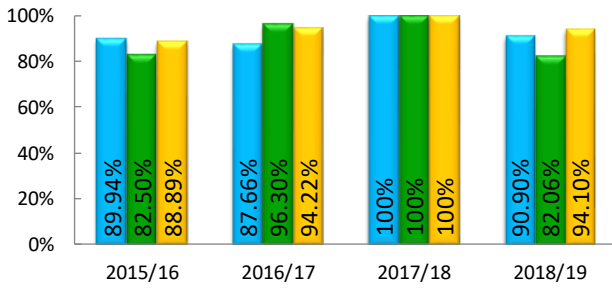
Managing E.coli risk within the Council - The partner councils all have a role in procuring and providing food to a range of establishments. Over the last three years, significant progress has been made to address the E.coli risk at Cardiff Council. A corporate Action Plan is in place and an E-learning module has been significant in allowing a greater numbers of relevant employees to be trained and this has been reflected positively in the Action Plan. The SRS recognises the need to maintain this momentum to implement and develop these corporate procedures and as such will continue to support this regime in 2019/20. The impact upon the overall compliance of the Council establishments at Cardiff has been significant and the Service has now begun to extend this regime to the other partner councils. Supporting these "in-house" regimes is not a core function of the Shared Service and any work undertaken requires funding from the partner Councils.

Performance Measures

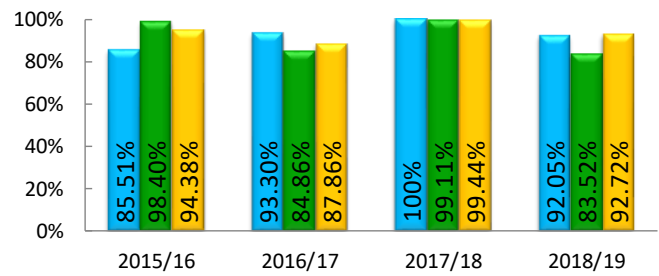
The only current Public Accountability Measure relevant to Food Safety is PAM/023, however other performance indicators such as service improvement data are collected. The following graphs show the results for the last 4 years.

■ Bridgend
 ■ Cardiff
 ■ Vale of Glamorgan

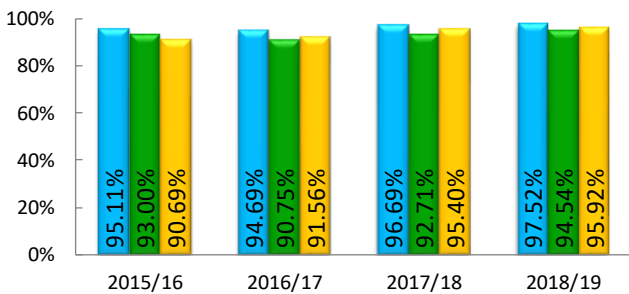
**% of high risk inspections
Food Hygiene (A, B & C rated premises)**



**% of new Food Hygiene businesses identified
and visited**



**PAM 023 - % of food premises that are broadly
compliant with food hygiene standards**



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

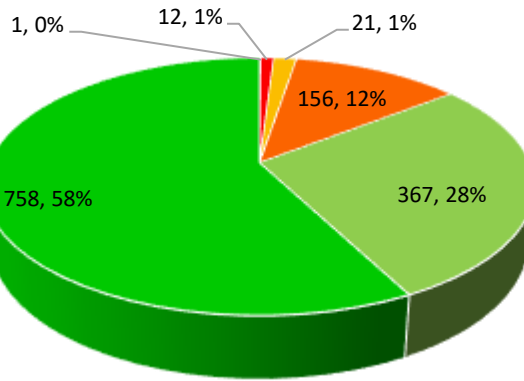
Food Hygiene Rating Scheme - the number of food businesses with a food hygiene rating of more than 3 increased in each authority area during 2018/19 from the previous year. (Bridgend from 96.69 to 97.52%, Cardiff 92.71% to 94.54%, Vale of Glamorgan 95.40% to 95.92%). This can be attributed to the success of the intervention programme for food businesses and ensuring that any food safety issues identified are followed up by appropriate enforcement and revisits to ensure compliance with food safety law. Furthermore the positive impact of Food Hygiene Rating Scheme encourages businesses to strive for a better rating.

The FHRS was introduced in October 2010. As premises are inspected they received a hygiene rating. In November 2013 a statutory scheme was introduced throughout Wales.

The following charts highlight the number of premises inspected across the region together with their rating. A breakdown of the scores across Bridgend, Cardiff and Vale of Glamorgan can be found below.

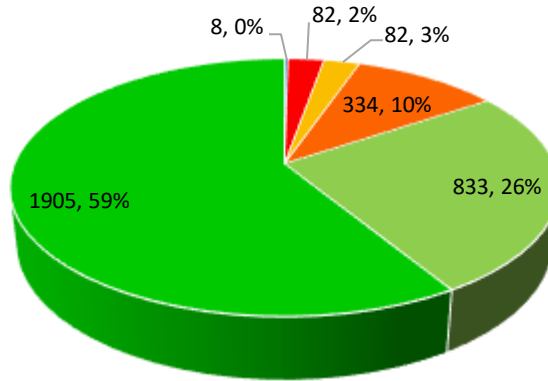
FHRS - Bridgend June 2019

■ Zero ■ One ■ Two ■ Three ■ Four ■ Five



FHRS - Cardiff June 2019

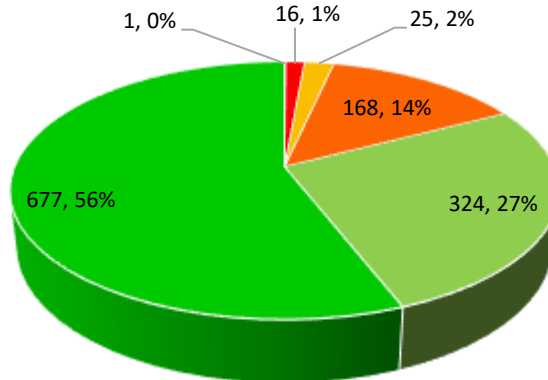
■ Zero ■ One ■ Two ■ Three ■ Four ■ Five



■ Zero ■ One ■ Two ■ Three ■ Four ■ Five

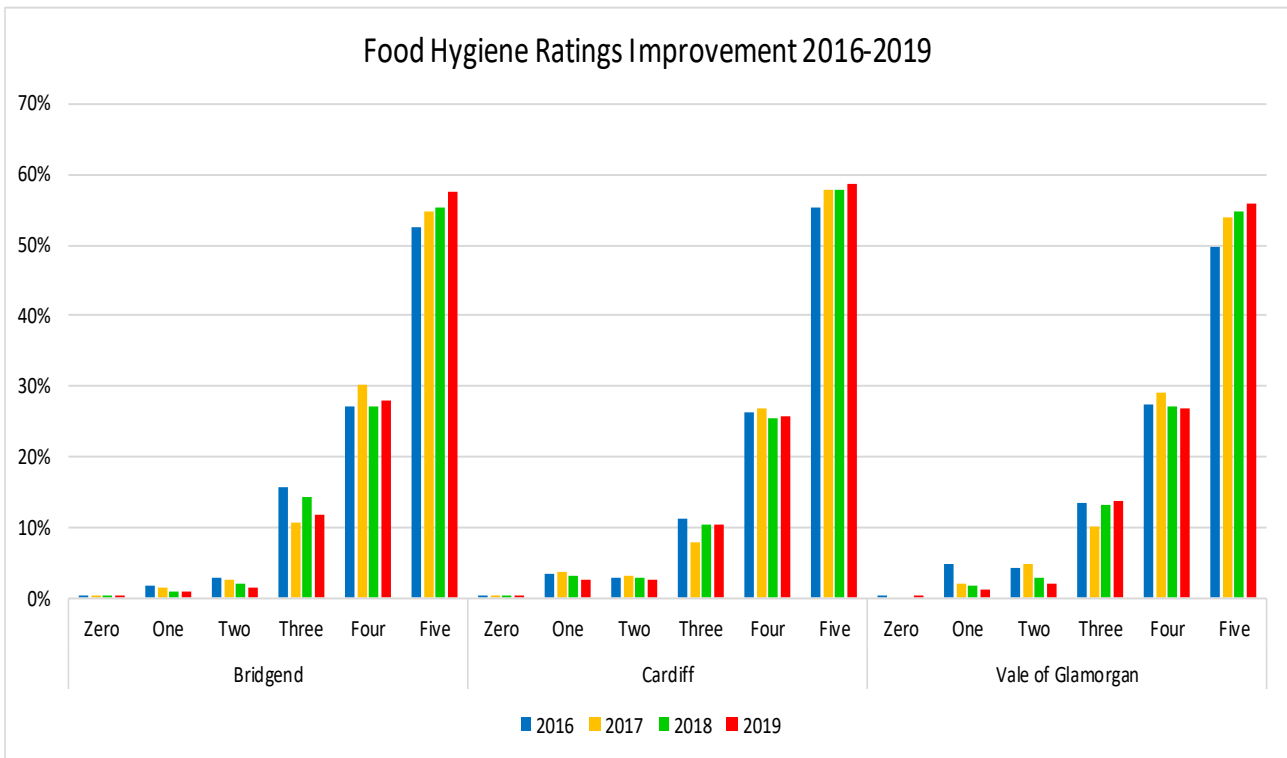
FHRS - Vale of Glam June 2019

■ Zero ■ One ■ Two ■ Three ■ Four ■ Five



■ Zero ■ One ■ Two ■ Three ■ Four ■ Five

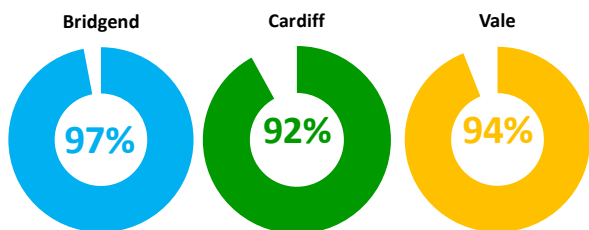
The Scheme has had a positive impact in improving standards in food businesses and the following graph demonstrates how over a 4 year period the percentage of businesses that have been granted a '5' rating, the highest rating that can be achieved, has increased. Similarly the number of low scoring businesses has dropped.



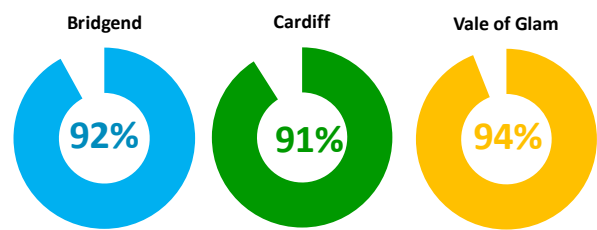
Customer Satisfaction

During 2018/19 questionnaires were sent to food business customers following an inspection to gauge their views on the inspection process across the 3 areas. A flavour of the results received can be found below and suggest that SRS are having a positive impact on food businesses and that customers are satisfied with our services.

Businesses who felt food safety inspection helped them improve food hygiene standards in their business 2018/19



% of food businesses satisfied with overall level of service 2018/19



Prosecutions and enforcement action

Cardiff Restaurant fined £10,500, for a string of food hygiene offences - A Cardiff Restaurant was fined £10,500 ordered to £4065 and a victim surcharge of £170 after pleading guilty to 16 food hygiene offences following intervention by officers from Shared Regulatory Services. Visits were made to the business between October and December 2017 to find that the restaurant didn't have a food safety management system in place, failed to protect food from contamination, failed to ensure food handlers' personal cleanliness and that they were adequately trained, failed to comply with a remedial notice and failed to keep the premises in good repair.

Cardiff Restaurant manager and company fined £5000 for not displaying a food hygiene rating sticker -

Following receipt of complaints that a restaurant was not displaying their food hygiene rating sticker showing a rating of 2, SRS officers undertook a number of visits to the restaurant to investigate the complaints. Initially, as a result of these investigations, a fixed penalty notice was issued for £200 which was paid, however further complaints were made about the premises. Officers re-visited the premises a number of times which subsequently revealed that a sticker had been placed in the bottom left hand corner of a full length window which was being obscured by table and chairs. Legislation states that the sticker must be put up 'close to the entrance...where it is capable of being easily read by the customer before they enter' and this was explained to the manager. Following further correspondence, the sticker was eventually moved to a satisfactory position, however following a further complaint, it was found to be blocked by a large patio heater and couldn't be seen. SRS received significant press attention as a result of this case and also received a letter from the Food Standards Agency congratulating the department on the successful result of the case.



Barry Businessman fined £6,350 after pleading guilty to 14 food offences – In this particular case, a businessman pleaded guilty to 14 food offences which occurred in 3 premises in the Vale of Glamorgan during 2017. He was fined £3350 for the breach of a Hygiene Improvement Notice and £1000 for each of the 3 offences that concerned the cleanliness of working utensils, failure to ensure an adequate number of wash basins and failure to ensure appropriate facilities were in place to maintain adequate personal hygiene. He was also ordered to pay investigation costs of £1500 and a victim surcharge of £335.

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

Food Hygiene Enforcement Actions 2018/19			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	2	29	4
Seizure, detention and surrender of food	3	22	1
Suspension/revocation of approval or licence	0	0	0
Hygiene Emergency Prohibition Notice (Formal)	0	0	0
Prohibition Order	0	0	0

Simple caution	0	3	0
(Hygiene)Improvement notice	4	15	11
Remedial action and detention notices	5	10	5
Written Warnings	561	1325	495
Prosecutions concluded	0	2	1

6.1.2 Review of Food Standards Interventions 2018/19

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following sections identify those planned interventions due at the beginning of 2018/19 for Food Standards and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions, together with those that were actually undertaken and the overall % achievement. The number of interventions due fluctuates during the year as premises close and new businesses open. The % achievement therefore represents those that were due and which were carried out throughout the year, rather than against those that were due at the beginning of the year.

Food Standards Intervention Plan 2018/19									
Risk Category	Number of Interventions due at start of year (including any backlog)								
	Bridgend			Cardiff			Vale of Glamorgan		
	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year
High Risk	5	1	100%	21	15	100%	1	1	100%
Medium - Low Risk	See note 1 below	173	N/A	See note 1 below	217	N/A	See note 1 below	131	N/A
New Business	191	156	90.70%	579	611	86.18%	182	154	89.02%
Re-visits	4	4	N/A	20	17	N/A	4	5	N/A
Total	200	334		620	860		187	291	

Note 1 - Currently the service is resourced to only deliver an inspection programme for high risk and new businesses only, however medium and low risk inspections are picked up via surveys, complaints and by using Food Safety Inspection Forms throughout the year which ensures that many such premises are inspected. The figures above show the actual number carried out during 2018/19

High risk interventions

During 2018/19 an overall high risk inspection rate of 100% was achieved across Bridgend, Cardiff and the Vale of Glamorgan against a target of 100%

Medium and low risk interventions

Currently the service is resourced to only deliver an inspection programme for high risk and new businesses only, however, medium and low risk inspections are picked up via surveys, complaints and by using Food Safety Inspection Forms. As a result of this, no target was set at the beginning of the year, however through this method of intervention, the service undertook 173 interventions in medium and low risk interventions in Bridgend, 217 in Cardiff and 131 in the Vale of Glamorgan.

New Business

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

Cardiff has a high turnover of business ownership which presents a challenge for the service, over and above the routine inspection programme. During 2018/19 a total of 1054 new premises were identified across the region in relation to food standards, with 709 of these being in Cardiff representing a 67.27% of new businesses across the three areas. In Bridgend 172 new premises were identified and a further 173 in the Vale of Glamorgan. Notwithstanding this, the service inspected 90.70% premises in Bridgend, 86.18% in Cardiff and 89.02% in the Vale of Glamorgan.

The Food Law Code of Practice requires new businesses to be inspected within 28 days, which can become challenging due to food businesses often registering with the service but not ready to trade within the 28 days.

Re-visits

Inspection of food businesses can require follow up visits to ensure compliance with food standards requirements. The number of re-visits is difficult to forecast however an estimate is made based on the actual number carried out in the previous year. Results show that 4 re-visits were undertaken in Bridgend, 17 in Cardiff and 5 in the Vale of Glamorgan.

Food Standards Projects

- **Allergy Sampling** – thirteen samples were purchased across SRS from takeaway premises and tested for the presence of crustaceans after an allergy was declared at the point of ordering. Three premises refused to sell, two –premises failed and eight passed. The premises that failed were given further advice and education and then formally re tested. Both premises that had previously failed were re tested and correctly identified the allergen in the dish and refused to sell.
- **Undeclared Milk in Kebabs** - Officers also carried out a sampling project testing for undeclared milk in kebabs following a death the previous year in Bath of a 15 year old. Ten samples were taken and four failed. Warnings were issued to those premises that failed and further sampling will be carried out in this financial year. One premise had received meat from suppliers that was labelled incorrectly as it did not identify milk as an ingredient. The team have therefore worked with the manufacturers to resolve this issue.

- **Acrylamide** – Acrylamide is a natural chemical that is formed when starchy foods such as potatoes or bread are cooked for long periods at high temperature. To comply with the legislation all food business operators are required to put in place simple and practical steps to manage acrylamide within their food safety management systems. This is to ensure that acrylamide levels are as low as reasonably achievable in food. In order to survey compliance officers undertook a sampling exercise whereby Eighteen samples of chips sold from chip shops were taken and all samples were satisfactory.
- **Informal Sampling** - Twenty seven informal samples were taken from a variety of retail outlets and takeaways following an inspection. Seven of those failed testing and received further advice and education with a written warning. Thirteen formal samples were taken that resulted in an improvement notice being issued and formal action taken.

Prosecutions and enforcement action

Three takeaway owners fined for selling unsafe food – Three owners of takeaways in the Barry and Bridgend areas were prosecuted following test purchases carried out in relation to allergens. Orders were made of rice dishes where the businesses were specifically told it was for someone who was allergic to egg. However, when tested the food was later found to contain egg or egg protein. In one case, 77 times the amount of egg required to cause a reaction in an allergic person was found. Furthermore, these purchases were conducted only a few months after informal test purchases had been carried out when all three business had failed and subsequently been provided with advice. The businesses were fined in total £1800, £1975 in costs and £265 victim surcharges. One owner was given a Community Order to undertake 300 hours of unpaid work.

The following enforcement actions were undertaken in respect of food standards.

Food Standards Enforcement Actions 2018/19			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	0	0	0
Seizure, detention and surrender of food	0	1	0
Suspension/revocation of approval or licence	0	0	0
Emergency Prohibition Notice (Formal)	0	0	0
Prohibition Order	0	0	0
Simple caution	0	0	0
Improvement notice	0	0	0
Written Warnings	12	130	7
Prosecutions concluded	2	1	1

6.1.3 Review of Feed Safety Interventions 2018/19

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. This Plan would usually identify those planned interventions due at the beginning of 2018/19 for Feed Safety and report on the delivery of those interventions, however, due to issues encountered with data retrieval, further details will be provided in due course and appropriate approval sought.

High risk businesses

The number of high risk interventions due at the beginning of 2018/19 was not identified in the Intervention Plan for that year, however a target of 100% was assigned through the SRS performance framework. During 2018/19, no high risk inspections were programmed for Bridgend and the Vale of Glamorgan, but Cardiff achieved an overall high risk inspection rate of 75% against a target of 100%. This equated to one inspection outstanding at the end of year.

New business

The estimated number of new businesses due an intervention at the beginning of 2018/19 was not identified in the Intervention Plan for that year, however a target of 80% was assigned through the SRS performance framework. The Service failed to meet that target achieving 62.5% in Bridgend, 40% in Cardiff and 69.23% in the Vale of Glamorgan. The number of new feed businesses is relatively low and the number outstanding relates to 13 premises.

Re-visits

The estimated number of re-visits due at the beginning of 2018/19 was not identified in the Intervention Plan for that year, as these are impossible to forecast. No re-visits however were undertaken during the year.

Feed Safety Projects

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

Prosecutions and enforcement action

No prosecution or enforcements were undertaken during 2018/19

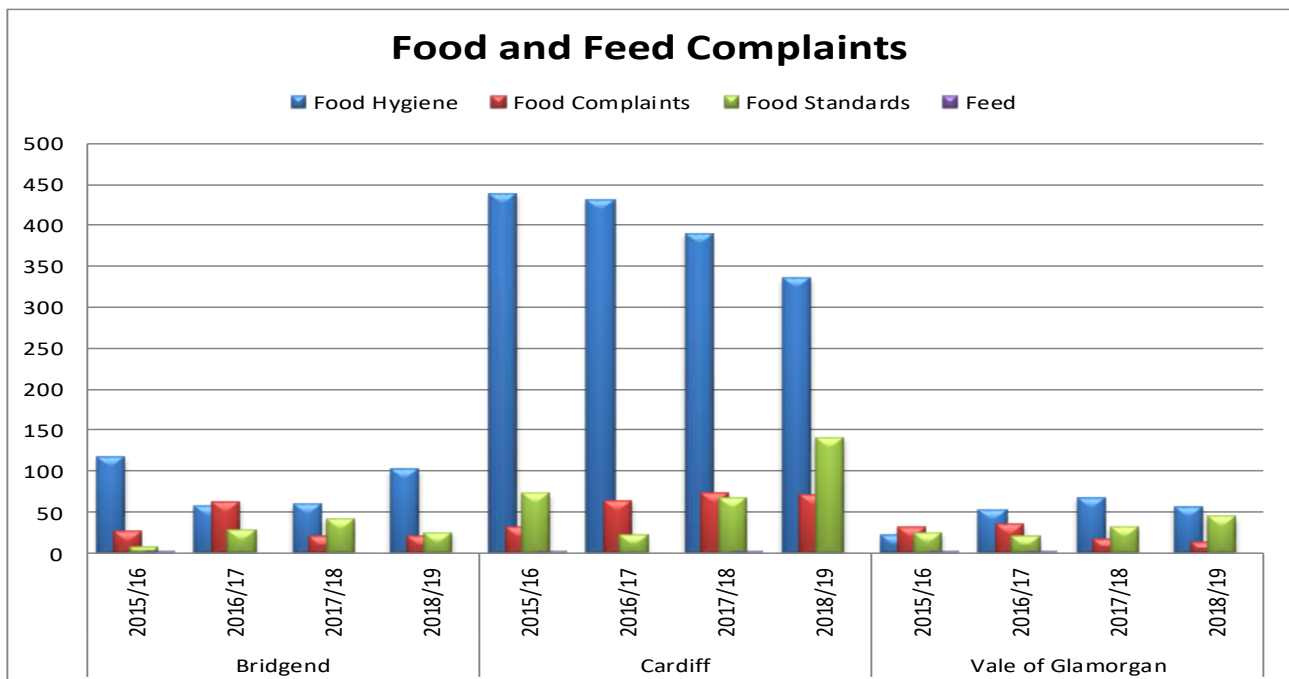
6.1.4 Complaints

Based on the requests received during the previous year, it was estimated that the service would receive 766 service requests during 2018/19, however the actual number was 807 (Bridgend 148, Cardiff 546 And Vale 113). The table below provides a breakdown of the estimated number and the number actually received and investigated.

Complaint type	Bridgend		Cardiff		Vale of Glamorgan	
	Estimate	Actual	Estimate	Actual	Estimate	Actual
Food Hygiene	59	102	390	335	67	56
Food Complaints	20	21	73	71	17	13
Food Standards	41	25	67	140	32	44
Feed Safety	0	0	1	0	0	0
Total		148		546		113

The following graphs shows a breakdown of the complaints received over the last 4 years by type. It can be seen that Cardiff receives significantly more complaints than both Bridgend and the Vale of Glamorgan, more than double of the two areas. This is to be expected due to the large number of businesses in Cardiff.

The number of complaints received regarding Animal Feed is very low. Last year no complaints were received.



6.1.5 Home Authority Principle and Primary Authority

SRS now has some 30 Primary Authority partnerships in place with both local and national businesses and is able to charge for the work done as part of these arrangements on the basis of full cost recovery. Of those Partnerships, and despite the new regulatory scope approach within the changes to Primary Authority, eighteen are more likely to request or be given advice and support from a Food or Feed perspective:

- Brutons the Bakers
- Filco Supermarkets
- Global Foods
- Just Perfect Catering
- Royal Voluntary Service
- Sloane Home Limited
- TGS Group (t/a The Grazing Shed)
- Vale Hotel & Resort
- Vydex Corporation
- Wild Water Group

Devolved Welsh Partnerships:

- Association of Convenience Stores
- Craft Bakers Association
- Hallmark Care Homes
- HC-One Care Homes

- Mitchells and Butlers
- Sainsbury's
- Tesco
- Waitrose
- Wyevale Garden Centres

6.1.6 Advice to business

During 2018/19 Shared Regulatory Services has assisted businesses providing food and feed safety advice through a variety of channels, such as:-

- **Advice provided as part of the inspection process** – The service continues to provide food and feed safety advice as part of the inspection process, receiving the comments such as those below in relation to food safety inspections.

“The inspector was really pleasant and approachable. He helped us understand the inspection and made it clear how to improve certain areas”.

“Inspector was professional, helpful and gave clear advice and information”.

“I felt more confident in my practices after the inspection”

“Very approachable inspector did not make me feel uncomfortable at any time and felt able to ask any questions to improve my service”.

- **Responding to complaints and requests for service** – See 6.1.4 above.
- **Twice yearly food newsletter** - The Service's commitment to advising and supporting food businesses to achieve legal compliance and the highest possible standards continues with our twice yearly newsletter 'Food and Safety News', aimed at food businesses to inform, educate and advise on responsible food safety and health and safety across Bridgend, Cardiff and the Vale of Glamorgan.
- **Provision of information leaflets** - The service provides guidance leaflets for new businesses that are starting out, home caterers, childminders, nurseries, event catering and also good practice hygiene guide for lower risk premises. There is also an event organisers guide to ensure that all food safety matters are considered during the planning of an event.

In 2018-19, a successful bid to the Food Standards Agency resulted in funding being awarded to SRS to tackle poor food hygiene rating scores across the region (scores of 0 – 2). The FHRS intervention grant enabled officers to target those businesses most in need of support in improving their score, and what followed was a programme of training and intensive 1 to 1 assistance provided to some 14 food businesses. The impact of the interventions in improving the scores of these businesses has been remarkable and so a bid has been submitted to the FSA to extend this work to a further premises having low FHRS scores. Should the bid for approximately £6.660 be successful, SRS will be able to provide this significant assistance to a further 30 premises during 2019-20, and it is hoped that the impact of this work will be as remarkable as it was in 2018-19. See also section 6.1.6

- **Promotion and participation in national events, such as Food Safety Week** – SRS regularly issues press releases and food tweets in relation to campaigns such as promoting tips on safely preparing turkey at Christmas.
- **Participation in working groups, such as Events Liaison Panel** – In order to ensure proper co-ordination with all partner agencies in preparation for the smooth running of major events, the Service is part of the Events Liaison Panel at Cardiff Council and the Events Safety Advisory Groups at both Bridgend and the Vale of Glamorgan. Having the capital city based within the SRS region and the coastline, there are lots of large events that are that attracted to the area such a the Volvo Ocean Race and the Eisteddfod as well as long standing events such as the Vale Show, Bridgend Show and Cardiff Food Festival amongst many others across the region. SRS had interaction or involvement in over 65 events during the course of 2018/19.
- **Advice through Shared Regulatory Services website** – A wide range of information is available on the SRS Website which is continually reviewed and updated.
- **Food Business Forums** – Building upon the success of the first Food Safety Event held in 2017, SRS hosted a forum for food businesses at the Principality Stadium in March 2019 to give businesses advice on how best to meet standards. Over 170 delegates booked onto the event, representing a diverse range of organisations, including cafés, health boards, nurseries and hotel chains. Environmental Health and Trading Standards professionals from SRS advised delegates about health and safety in catering and how the food hygiene rating system works in practice and how to improve and maintain a food hygiene rating. Furthermore advice was given on preventing the spread of norovirus and the topic of food allergens which gave attendees the chance to understand their responsibilities in law whilst ensuring the safety of their customers. The event also highlighted the tailored advice services available as a paid-for service, or through Primary Authority partnerships which can include staff training, auditing of terms, conditions, policies and procedures and mock food hygiene inspections to better prepare businesses for the real thing. Events give SRS an opportunity to engage with Food Businesses and provide training on new legislation, topical issues or guidance to improve Food Safety compliance.
- **Practical targeted training** –SRS has provided accredited training to 169 individuals through its Level 2 and 3 Food Safety and Level 2 Health and Safety Courses. Furthermore the service has also delivered bespoke training in areas such as infection control, labelling and compositional requirements of honey, HACCP, allergens, labelling and consumer rights to at least a further 70 delegates. Satisfaction with the training provided is very positive with 100% of attendees saying that the training they received will help improve standards of compliance in their business.

A successful bid to the Food Standards Agency resulted in funding being awarded to SRS to tackle poor food hygiene rating scores across the region (scores of 0 – 2). The FHRS intervention grant enabled officers to target those businesses most in need of support in improving their score, and what followed was a programme of intensive 1 to 1 assistance provided to some 14 food businesses. The impact of the interventions has been evaluated by reference to the FHRS scores of each of the businesses both before and after the training and support was provided. The results are quite remarkable. Most notably:-

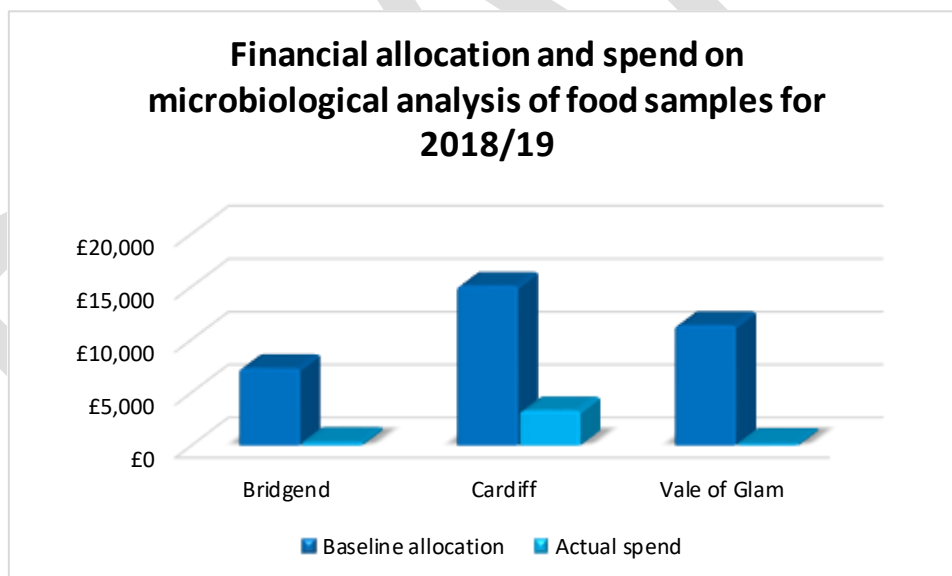
- The average FHRs score across the fourteen businesses before the intervention was 1.5
- The average FHRs score across the fourteen businesses after the interventions was 4
- The greatest improvement was shown by a business achieving a FHRs rating of 4 having previously been zero rated
- Three premises achieved a 5 rating after the intervention, two having been on a rating of 2 previously and the other on a rating of 1.

As an added benefit of this work, officers were able to pilot the newly developed SRS HACCP training for businesses which is now available to book. It is hoped that given the huge success of the project in driving up low FHRs scores, similar interventions will be possible in the coming year, ideally with further FSA funding.

- **Paid for food hygiene advice visits available to all applicable food businesses** - Shared Regulatory Services offers a paid for advice service to businesses. A fee of £110 +VAT is charged for a 2 hours on site advice visit tailored to the businesses needs with a follow up written report. During 2018/19, 37 fee paid advice visits were undertaken.

6.1.7 Food and Feed Sampling

In 2018/19 149 samples were collected and submitted to Public Health Wales for analysis. (13 Bridgend, 123 Cardiff and 13 Vale of Glamorgan).



During 2018/19 Bridgend received an allocation of £7,306, Cardiff £15,092 and Vale of Glamorgan £11,359 for the microbiological analysis of food and water samples from Public Health Wales. Unfortunately last year the Service was unable to utilise the available budget for sampling due to the cut of the sampling post in Commercial Services and service demands requiring prioritisation of programmed interventions above sampling by the food safety officers. In Cardiff this was partly alleviated by the employment of a temporary part time sampling officer.

The majority of informal food samples taken for surveillance and monitoring purposes will be assessed using the criteria contained in the "Guidelines for Assessing the Microbiological Safety of

Ready-to-Eat Foods Placed on the Market”, revised HPA Guidance 2010 and Microbiological Criteria for Foodstuffs (EC Regulation 2073/2005). Most of these samples will be of an informal nature but the provisions of the Food Law Code of Practice will be followed when formal samples are required e.g. where a prosecution could result.

Food Hygiene

Survey	Target	Achievement
Ice survey	60 businesses	10 businesses
Shopping basket	0 samples	129 samples
Mobile vendors	12 businesses	1 businesses
Cream nozzle survey	80 samples	4 samples
Herbs and spices	12 samples	0 samples

Food Standards

In relation to Food Standards, SRS carried out a wide variety of surveys during 2018/19 which are highlighted in Section 6.1.2 of this Plan.

Feed Safety

The following feed sampling was undertaken following receipt of a complaint.

Points of Entry	NUMBER OF SAMPLES
Annex II	
Heavy Metals	
Dioxins and dioxin like PCBs	
Mycotoxins	
Unauthorised GM	
Cocciostats	
Labelling	7
Annex I and III	
Heavy Metals	
Mycotoxins	

6.1.8 Control and investigation of outbreaks and food related infectious disease

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following section highlights the number of expected interventions due at the beginning of 2018/19 and the numbers carried out together with information on other activities. More detailed information can be found in the Communicable Disease and Health Protection Service Plan 2019/20.

Communicable Disease Intervention Plan 2018/19						
Type	Number of Interventions estimated at start of year and the actual number carried out					
	Bridgend		Cardiff		Vale of Glamorgan	
	Due based on estimate	Actual	Due based on estimate	Actual	Due based on estimate	Actual
Total No. of food poisoning notifications	243	322	692	790	260	277
No. of outbreaks	24	14	34	30	13	11
Total	267	336	726	820	273	288

In 2018, SRS was notified of 1,707 cases of communicable disease of which 1389 (81%) were laboratory confirmed and 318 (19%) were suspected food poisoning cases. These figures show a marked increase to the numbers observed during 2017 where a total of 1354 cases of communicable disease were reported to SRS, of which 1070 (79%) were laboratory confirmed and 318 cases were unconfirmed, suspected food poisoning cases.

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

	Notified CD Cases (¹ CFP)	Unconfirmed CD Cases	Total CD Cases
Bridgend	322 (239)	45	367
Cardiff	790 (617)	220	1010
Vale	277 (205)	53	330
TOTAL	1389 (1061)	318	1707

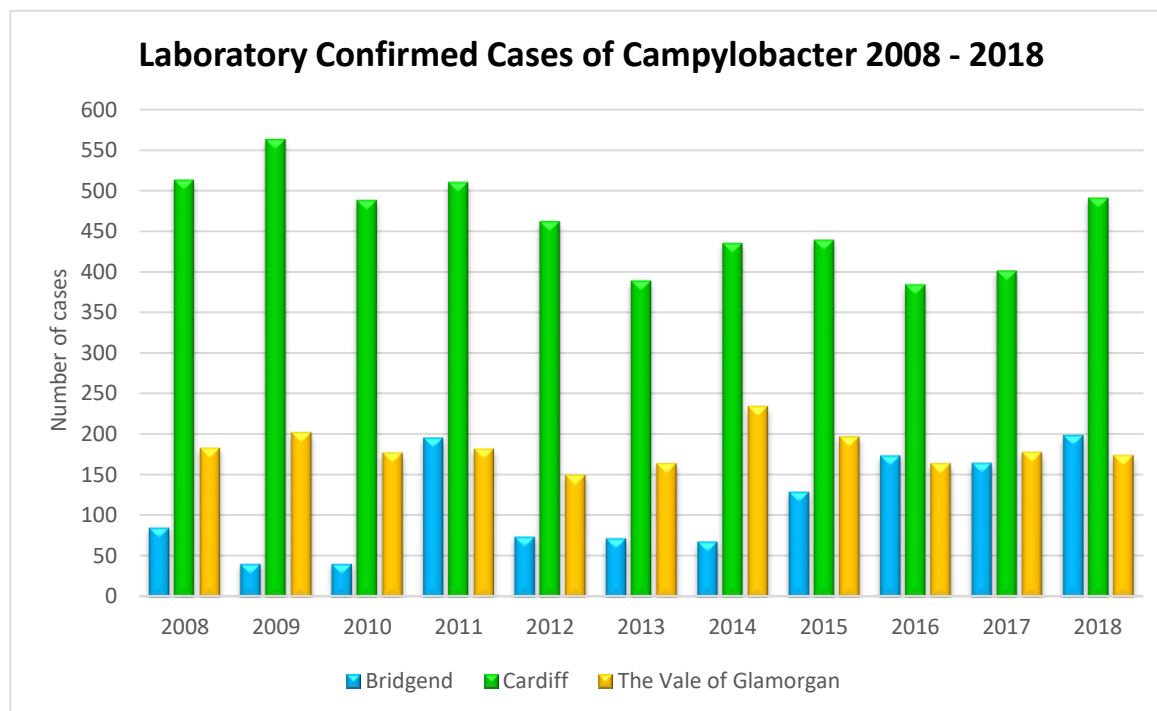
¹CFP – confirmed food poisoning as applied in the ‘Disease’ tab in Tarian

Case numbers for Bridgend and Vale of Glamorgan Councils have remained constant, however there has been a marked increase in notifications to Cardiff. This trend is not unexpected due to Cardiff having a much larger number of residents (compared to Bridgend and the Vale); a higher number of food businesses and a high transient population made up of visitors, daily commuters and students.

The incidence of Campylobacter infection throughout SRS far exceeds other notifiable diseases, which reflects the national trend observed across the UK. The reason for such high numbers of cases is the wide range of risk factors associated with Campylobacter. Campylobacter remains an important public health risk. The pathogen has multiple risk factors in addition to having a low

infective dose, meaning that a person only needs to be exposed to a small amount of the bacteria to become ill. It is therefore critical that the communicable disease service retains the requisite level of resource to be able to effectively investigate all confirmed cases in a timely manner.

Graph: Reported cases of Campylobacter from 2006 – 2018



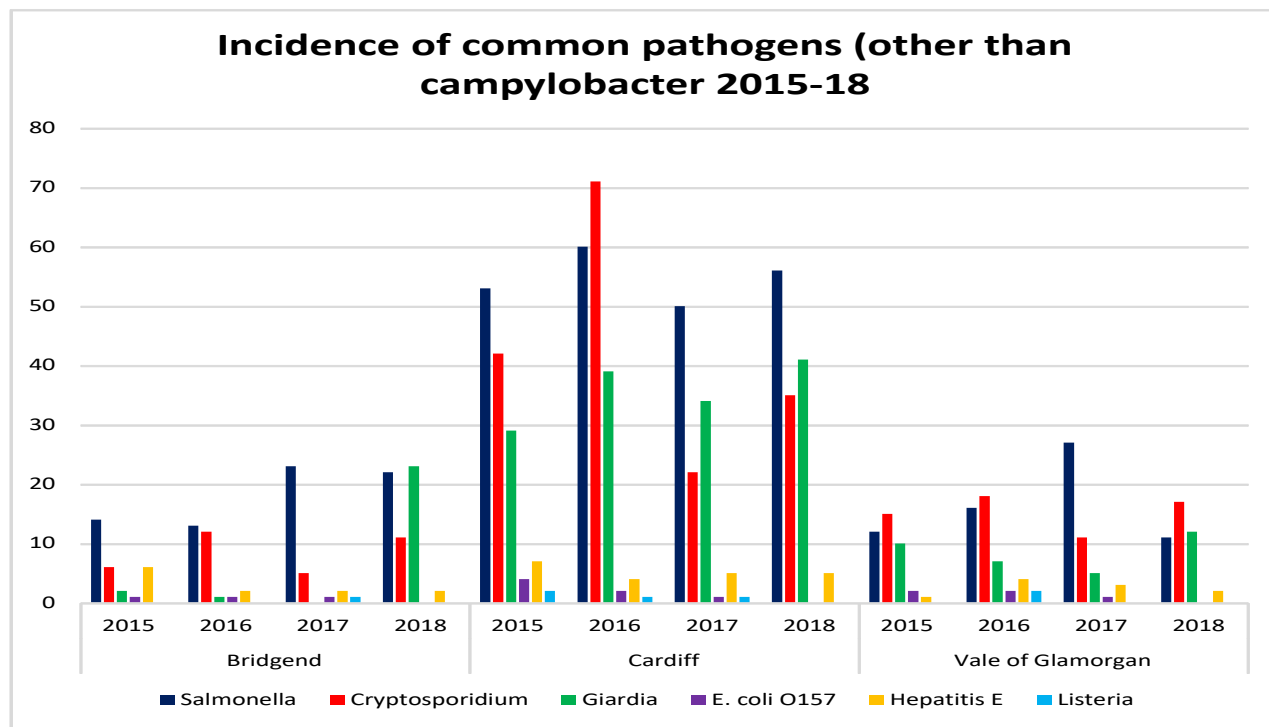
Pathogens of public health significance (other than Campylobacter) commonly require more detailed investigation; either because the pathogen can be readily spread within the community, or because of the seriousness of the infection. The need to complete enhanced interview questionnaires to identify close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

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

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

The graph below illustrates the incidence of common pathogens (other than Campylobacter) that have caused illness across SRS between 2015 and 2018.

Graph: Incidence of the common pathogens causing food poisoning in SRS between 2015 – 2018



The number of reported cases of certain pathogens has seen an increase since the introduction of new laboratory testing methods. This is particularly true for Giardia where a total of 5 family clusters were detected in 2018 by Officers requesting faecal samples from close family contacts of confirmed cases.

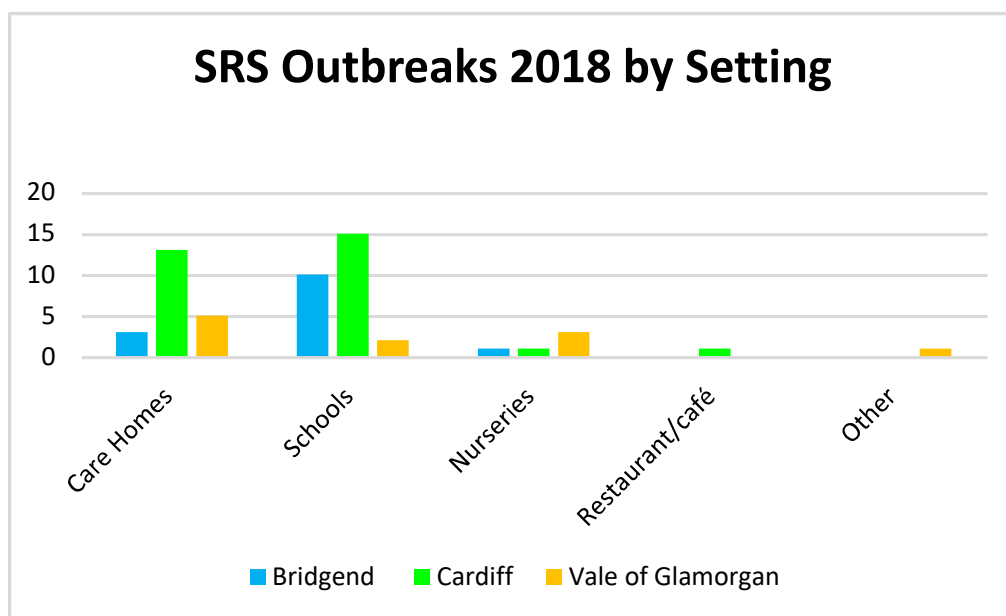
Outbreaks

In addition to the investigation of sporadic cases of food poisoning in 2018, a total of 55 outbreaks were identified and investigated by the Communicable Disease Service, of which:

- 14 outbreaks occurred in Bridgend;
- 30 in Cardiff; and
- 11 in the Vale of Glamorgan.

This compares to 71 outbreaks in 2017: 24 in Bridgend, 34 in Cardiff and 13 in the Vale of Glamorgan.

Graph: Outbreaks in 2018 in Bridgend, Cardiff & Vale of Glamorgan



Schools (49%) accounted for the highest number of reported outbreaks across SRS during 2018; followed by care homes (38%) and nurseries (9%). All outbreaks were associated with confirmed or suspected Norovirus infection.

In these situations Officers provide considerable support to the business duty holder, or legacy Authority for Council operated establishments, to ensure that enhanced cleaning arrangements are instigated at the earliest opportunity and maintained for the required duration. Officers also provide advice on the implementation of appropriate exclusion arrangements to ensure that the spread of infection is contained at the earliest opportunity, and disruption to business is minimised. Further information on the control and investigation of outbreaks and food related infectious disease can be found in the Communicable Disease and Health Protection Plan 2019/20.

Further details of projects and health promotion work can be found in the Communicable Disease and Health Promotion Plan 2019/20.

6.1.9 Feed/Food Safety Incidents

There was one Food Alert for Action received from the Food Standards Agency. No action was required across SRS.

There were no feed alerts during the last year.

6.1.10 Liaison with other organisations

Liaison with other organisations remains a constant theme of the work of SRS. The list at 3.8 represents all those organisations that the service liaised with during 2018/19.

6.1.11 Food and Feed Safety Promotion

Promoting a positive food safety culture is undertaken through a variety of channels, many of which are directly linked to providing advice to business. See 6.1.6 above. In addition, the following activities have also contributed to the Service's commitment to the promotion of food and feed safety during the previous year.

- **Managing the Healthy Options Award** - The award continues to be offered across the 3 authority areas and is administered by the Communicable Disease, Health and Safety Team. The Healthy Option Award aims to encourage food businesses to provide healthier options to customers via the introduction of healthier catering practices; increasing the amount of fruit, vegetables and starchy carbohydrates on the menu; decreasing saturated fat, sugar and salt content in the food offered. The scheme also recognises the provision of healthy options for children; rewards staff training; and the promotion and marketing of healthier options. During 2018/2019, 2 new awards were issued to businesses in Cardiff (1 silver; 1 bronze), and 11 awards were successfully renewed across SRS (1 in Bridgend; 10 in Cardiff).
- **Nutritional training** supports the uptake and sustainment of the healthy option award in food businesses across the 3 authority areas, and consequently SRS continues to provide level 1 community food and nutritional skill training courses on request. The aim of the training is to increase knowledge and skills in food and nutrition, particularly about the components of a balanced diet and how good nutrition can influence a person's health status.
- SRS is a member of, and continues to support, the Cardiff, Vale and Bridgend Healthy and Sustainable Pre-School Schemes (CHaSPS) and Gold Standards Health Snack Award advisory group. The communicable disease service provides infection control advice and support to its members as necessary, and reinforces the infection control message via attendance at events the group organises.

6.2 Identification of any variation from the Service Plan

The mechanisms in place to review performance enable remedial action to be put in place should any shortfalls against targets or plans occur during the year. Consideration will be given to the various factors that may contribute to any shortfalls and whether additional resources, re-allocation of staff resources or re-prioritisation of workload is required to resolve any problems.

Any issues that may not have been resolved at the end of the year will be included in the Service Plan for the following year.

Performance against the Food and Feed Law Service Plan 2018/19 has been outlined in detail above. It was recognised at the time of plan adoption that resources were insufficient to deliver the full requirements of the Food Law Code of Practice. Therefore, in light of the reduced resource available, decisions were made regarding priorities which included inspection of all A, B, non-broadly compliant C premises and new business for food hygiene purposes. These premises were the focus of priority throughout the year.

Unfortunately the level of resources available to address the high risk businesses was hit by an unforeseen reduction in staff due to an officer on maternity leave, the loss of 6 officers from the service and the loss of the sampling officer post to address required budget cuts. This had a dramatic impact on performance compared to the previous year's achievement and the inability to recruit suitably qualified and experienced staff delayed the ability to progress performance further. Engagement with the Chartered Institute of Environmental Health and tertiary education establishments has resulted in the offer of student places within the Service which is hoped to address this issue in the long term. The Service is continuing with a recruitment exercise to fill these vacant posts. The service is also engaging with contractors in order to complete the backlog of inspections as a result of these circumstances.

In accordance with the requirements of the food law code of practice, E rated premises inspections are able to be completed utilising self assessment questionnaires. This is due to the low risk nature of such premises, examples of which include clothing stores selling confectionary goods such as sweets and chocolates. The purpose of the questionnaire is to determine whether the said low risk food items have further developed and ensure the business would not require re-categorising based on it's practices. The service utilised the business support facility to send the aforementioned questionnaires by post which resulted in a small number of forms returned. In order to ensure receipt of all required information, the service further maximised the use of students from local universities who are studying environmental health and have successfully passed their food safety module. The students therefore visited the associated premises and completed the questionnaire on site with the food business operator.

It was also outlined during the year that the team would have difficulty in achieving the food standards programme set out. This was due to an officer from the Commercial Services section taking up an opportunity elsewhere in the service. Whilst attempts were made to utilise contractors to undertake food standards inspections unfortunately due to lack of availability of contractors this was not possible.

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

The training of Food Hygiene Officers to undertake food standards inspections will greatly assist the service in completion of medium and low risk food standards premises. The inspection for the purpose of food hygiene matters will be done as a matter of course with the food standards inspection being added to further enhance the inspection. Any further enforcement matters required for the purpose of food standards matters will be referred to the Trading Standards team for action.

6.3 Areas for improvement

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

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

A particular priority is to ensure the completion of the aforementioned Action Plan as a result of the Food Standards Agency Audit. A re-visit and further audit in relation to the action plan will take place in September 2019. The Service requires particular focus to ensure this is a successful outcome.

As a result of a review of the service, the following opportunities for development are identified for 2019/20

Food Safety

- Continue to implement and enforce the statutory Food Hygiene Rating System at all visits carried out by the Food and Port Health Teams and initiate projects to ensure appropriate display of ratings.
- Continue to prioritise high risk new businesses and A and B rated businesses for inspection.
- Continue to carry out interventions at C, D and E rated businesses in line with the requirements of the food law code of practice.
- Bid for any grant funding that maybe available in order to improve standards in poorly performing businesses.
- Engage with education establishments to try to address the recruitment issues by offering student placements.
- Establish arrangements for engaging with business and communicating food safety messages.
- Maximise the use of the available funding for sampling by developing and implementing a suitable sampling programme.
- Promote the uptake of paid for advice and training by businesses to improve their hygiene ratings.
- In light of the impact of the Shared Regulatory Service on Cardiff Council arrangements for Corporate E.coli management, continue to input into the Council's compliance with E. Coli Action Plan to ensure that the Council maintains working group meetings.
- Engage with local businesses to promote and secure additional Primary Authority relationships.
- Develop and implement a workforce development plan to ensure ability to meet goals and secure resilience of service. in preparation for potential Brexit.

- Develop a recruitment and retention policy to attempt to address current vacancy issues.
- Implement changes required by FSA Audit.

Food Standards

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

Feed Hygiene

- Work with the Wales Feed Group to standardise policies and procedures.
- Ensure all feed officers are kept up to date with changes in legislation through training courses and monitoring.
- Prioritise newly registered feed businesses for inspection.
- Increase the number of qualified and/or competent feed officers through training and monitoring to ensure resilience within the Service.
- To identify new feed businesses through self-assessment questionnaires and intelligence sharing.
- To review and update as necessary the register of feed businesses.
- Ensure database is up to date and accurate.

Communicable Disease

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

Appendices

- A. [Food Safety Sampling Plan](#)
- B. [Food Standards Sampling Plan](#)
- C. [National Feed Enforcement Priorities 2019-20](#)
- D. [Corporate Priorities of partner authorities](#)

Appendix A - Food Safety Sampling Plan

Food Safety Sampling Plan 2019/20						
Survey	Survey no. if applicable	Timeframe including days	Target Number of premises in total	Number, to be submitted at one time	Analysis required	Team
Ice Survey from licensed businesses and leisure industry	SRS19-02	September - October Thursdays	40 (20 Cardiff, 10 Bridgend and 10 Vale)	Approx 4	Aerobic colony counts at 37°C and 22°C, <i>E.coli</i> , Coliform, Faecal streptococcus (Enterococcus)	Commercial
Ice- cream Gelato and Slush	SRS 19-01	April – August May to September Mon- Wednesday	40 Cardiff,	Approx 4	Aerobic colony count, Enterobacteriaceae, <i>E.coli</i> (most probable number for ice cream samples), <i>Listeria monocytogenes</i> and other <i>Listeria</i> spp. (enumeration only), Coagulase positive staphylococcus	Commercial
Welsh Food Microbiological Forum Shopping Basket 15	SRS 19-03	April - March October to March Mon-Wednesday	20 Cardiff, 10 Vale and 10 Bridgend	Approx 4	Aerobic Colony Counts, Enterobacteriaceae, <i>E. coli</i> , <i>Staph aureu</i> , <i>Bacillus cereus</i> and species. <i>Listeria monocytogenes</i> and species (direct), <i>Listeria monocytogenes</i> and species (enrichment), <i>Salmonella</i> species (enrichment)	Commercial
Port Health Waters Shoreside and airside		April to March	13 locations	Approx 5	<i>E. coli</i> , Enterococci, Coliforms, Aerobic Colony Count	Commercial
Imported Foods		April to March unknown	Cardiff International Airport	Approx 4	Dependent on food.	Commercial

Appendix B - Food Standards Sampling Plan 2018-19

Q	Food Matrix	Analysis	Glamorgan Group/ SRS	Target Number	Safety/ Quality/ Fraud
1	Allergens. Pre packed or direct sales. Allergens at sandwich makers and deli catering establishments. Allergen to be selected based on local intelligence and type of premises	Allergens – test to determine presence of milk – anticipated cross contamination with other products	GG	9 - Cardiff 3- Bridgend 3 - VOG	Safety
1	Food delivery. There has been an increase in food delivery services. There is evidence to suggest that allergy information is not being passed to the consumer at the point of delivery	Allergens – allergen test to be confirmed. Peanut or almond	SRS	9 - Cardiff 3- Bridgend 3 - VOG	Safety
2	Fish Speciation. Chip shops and catering establishments. Half the samples to be taken from chip shops. Meals also to be tested for nutrition	DNA speciation Nutritional testing TBC	SRS	9 - Cardiff 3- Bridgend 3 - VOG	Fraud

Q	Food Matrix	Analysis	Glamorgan Group/ SRS	Target Number	Safety/ Quality/ Fraud
2	Fresh Meat Claims. BBQ season. Select produce from butchers claiming fresh and test for previously frozen. To include quality of meat if in a marinade	HADH activity Total volatile bases – deterioration indicator	SRS	9 - Cardiff 3- Bridgend 3 - VOG	Safety/Quality
3	Colours, descriptions and allergens at takeaways. Intelligence indicates that non permitted colours, substitution and mis description of food at catering premises is still a problem. Allergens testing to be focussed on the presence of fish/ crustacean/fish in satay sauces	Allergen – crustacean Permitted colours Speciation	GG	9 - Cardiff 3- Bridgend 3 - VOG	Safety/Fraud
3	Chinese supermarkets. Herbal teas and drinks made with exotic leaves and flowers.	Heavy metals	GG	9 - Cardiff 3- Bridgend 3 - VOG	Safety
4	Vegan/ Vegetarian claims. With the increased number of consumers embarking on a vegan diet, description of pre packed foods from catering establishments	Casein (Dairy)	SRS	9 - Cardiff 3- Bridgend 3 - VOG	Quality

Q	Food Matrix	Analysis	Glamorgan Group/ SRS	Target Number	Safety/ Quality/ Fraud
4	Extra Lean Claims. Premises have been identified selling minced meat with extra lean claims. Also include cross contamination with other species.	FIR compositional standard	SRS	9 - Cardiff 3- Bridgend 3 - VOG	Quality
All	Complaint sampling Follow up formal sampling	As required			
Total cost of sampling				120	

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Appendix C – National Feed Enforcement Priorities 2019-20



National Enforcement Priorities Safeguarding Public and Animal Health 2019-2020 and the National Targeted Monitoring Strategy (England)

Feed law enforcement (at all stages of production, processing, storage, transportation and distribution, including import/export and the primary production of feed)

Food hygiene law enforcement at the level of primary production

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Revised: March 2019

Introduction

The UK feed and food export industry, worth [£22 billion](#) currently, accounts for 60% of exports and it is imperative that future official controls delivered provides assurance to the UK's trading partners. Like any major industry, it is vulnerable to a wide range of criminal activity.

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

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

The priorities:

- have been informed by the Strategic Animal Feed Threat Assessment 2019 (AFTA 2019)
- have been developed in consultation with feed industry and LA representatives; National Trading Standards ([NTS](#)); the National Agriculture Panel (NAP) and National Animal Feed at Ports Panel (NAFPP) members
- support our Animal Feed Strategy mission to safeguard public and animal health by driving up sustained improvements in compliance, through intelligence led enforcement

The objectives of the priorities are to:

- drive an intelligence led approach to official controls, focusing resources on higher risk and non-compliant business, placing an increased focus on outcomes
- maintain a level playing field for honest and diligent food and feed businesses, which is in the interests of industry as a whole
- reduce unnecessary burdens on business by focusing LA activity on agreed areas of greatest threat to public and animal health
- create a flexible and intelligence-led approach to interventions, placing an increased focus on outcomes
- realise our strategic goal of '[Food We Can Trust](#)' and drive up the quality and consistency of official controls

Feed business operators have a legal obligation to comply with feed law and we call on the feed industry, and in particular FSA approved assurance schemes, to proactively promote the importance of driving up compliance in the identified risk areas.

These priorities will be reviewed on a six-monthly basis in light of any emerging issues or other intelligence received by us regarding risks to human, animal health and welfare or the environment.

National Enforcement Priorities for 2019/20¹

Animal Feed National Priorities



Food Hygiene Primary Production National Priorities



¹ The priorities are not listed in any particular order

Animal Feed National Priorities

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

Our strategic [plan](#) refers to the 'importance of continuing to develop and apply a robust evidence base' in our work and a commitment to 'gather and use evidence to identify and understand the biggest risks and challenges'. Gathering and exchange of information, data and intelligence between Competent Authorities, central government departments and industry is a key element to an effective risk-based system of official feed controls.

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

- a) proactively use the recognised trading standards national intelligence databases ([IDB](#) and Memex) to record intelligence, share with, and report to, the National Food Crime Unit ([NFCU](#)) all intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases
- b) liaising, as appropriate, with inland authorities and proactively sharing information and intelligence in accordance with ACTSO guidance on [inland referrals](#). Referrals
- c) acknowledging and responding, in a timely manner, to authorities, when matters are referred inland, to confirm action taken, providing as much supporting information as possible
- d) liaising with the LA responsible for the nearest large point of entry for feed, or other appropriate point of contact, to use their expertise and co-operation to assist in implementing a proportionate system of official controls
- e) proactively implementing the feed hygiene [MoU](#) between the Veterinary Medicines Agency ([VMD](#)) and the Animal Plant and Health Agency ([APHA](#)), which supports an intelligence led, risk-based approach to enforcement, prevents duplication of work and aids effective use of resources
- f) ensuring regular liaison with LAs in their area responsible for keeping registers of food business establishments (FBOs) under Article 6(2) of Regulation (EC) No 852/2004 on food hygiene

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

Every year in the UK, around [660,000 tonnes of former foodstuffs are processed as animal feed, worth £110 million](#). Within the UK, the Waste and Resources Action Programme ([WRAP](#)), is continuing to encourage businesses in the food supply chain to sign up to the [Courtauld agreement](#). The agreement aims to improve resource efficiency and reduce the carbon impact of the UK grocery sector, involving manufacturers and retailers reducing food waste by encouraging and developing its use as animal feed.

LAs are expected to give priority to the validation of effective feed safety management systems at businesses supplying former foodstuffs or co-products by ensuring interventions include the examination of documented feed safety management systems (HACCP plans where they are used)².

This should include a focus on the following:

- a) the identification of control points to ensure that material is suitable for use as animal feed and does not include items such as meat, fish and shellfish (and products containing them or have been in contact with)
- b) appropriate segregation being in place with material not intended for use as feed
- c) the existence of a recorded training programme for staff in charge of dealing with former foodstuffs
- d) material being supplied is to a registered feed business establishment
- e) where the material is a former foodstuff containing [packaging](#) intended for use in feed, the material is to undergo further treatment at a feed business which specialises in the removal of packaging of foodstuffs
- f) in the case of processors of former foodstuffs into feed that their suppliers and hauliers are all registered as feed businesses

² Recognising that where a business has a [primary authority](#) relationship validation of compliance should be in respect of agreed centralised systems

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

LAs are expected to give priority to validating appropriate implementation and maintenance of permanent written procedures based on HACCP principles by ensuring FeBOs understand legal requirements, are implementing and maintaining and reviewing, as appropriate, their feed safety management systems, having regard to the nature, size and scale of business³.

This should include a focus on the following:

- a) examination of written feed safety management systems
- b) identification of hazards ensuring all steps in the process have been considered and any grouping of steps (e.g. consideration of individual ingredients) is appropriate and not done in such a way that hazards are overlooked or applied incorrectly
- c) that Critical Control Points are correctly identified, properly defined and controlled. Where hazards within the CCP are already adequately controlled by a pre-requisite procedure, the necessity for a critical control point should be raised with the FeBO
- d) establishing that appropriate systems are in place to minimise cross-contamination between batches of feed (particularly in respect of those containing coccidiostats, veterinary medicines or [additives](#) with maximum permitted levels for particular target species, in accordance with our National Sampling [Protocol for coccidiostats, regional reporting template](#) and [guidance](#))
- e) appropriate sampling programmes at the feed business are in place to verify compliance with maximum permitted levels of undesirable substances in feed materials and additives. Checks should include an examination of results of analysis and consideration of whether appropriate action has been taken
- f) scrutinising traceability systems to ensure that products not intended for feed use are not diverted into the feed/food chain

³ Recognising that where a business has a [primary authority](#) relationship validation of compliance should be in respect of agreed centralised systems

Priority 4: Verification of the accuracy of feed labelling particulars

Information on feed labels is essential to enable FeBOs, throughout the feed chain, to make appropriate use of material they use to manufacture feed or use as feed. The presence and accuracy of:

- labelling information is critical in ensuring feed is provided to the correct species, age of animal and in quantities that would not adversely affect human and/or animal health or impact on traceability
- batch codes aids prompt recall and withdrawal of affected products in the event of a feed safety incident

LAs are expected to give priority to:

- a) verifying the accuracy of claims as set out in Article 13 of [Regulation \(EC\) No 767/2009 on the placing on the market and use of feed](#)
- b) ensuring labelling and presentation of feed does not mislead the user, particularly in respect of the country of origin, quality and method of manufacture or production e.g. organic and non-GM⁴
- c) additives present in feed are [authorised](#) in line with [Regulation \(EC\) No 1831/2003 on additives for use in animal nutrition](#)

Priority 5: Effective monitoring of consignments of feed originating from 3rd Countries, at points of entry

Imported feed makes up 40% of feed used in the UK annually. Sampling imported feed is a key mechanism to ensure the safety and quality of feed and food entering the UK.

To support a consistent and risk-based approach to monitoring 3rd country imports LAs are expected to give priority to monitoring consignments of feed originating from 3rd Countries, in consideration of:

- a) ACTSO [guidance](#) on consistency and prioritisation of the delivery of official controls at points of entry
- b) sampling consignments which have not been sampled recently or have not been seen before at the point of entry or where there is reason to believe they might fail to comply with legal requirements

⁴ Genetically Modified

Food Hygiene Primary Production National Priorities

Priority 6: Effective identification of higher-risk, ready-to-eat food businesses operating at the level of primary production

The identification of higher-risk, ready-to-eat food businesses, operating at the level of primary production, will assist in the future delivery of a more targeted, prioritised food hygiene inspection programme to achieve greater efficiencies and public health protection, whilst limiting inspection burdens on businesses.

LAs are expected to give priority to the identification of higher-risk, ready-to-eat food businesses' operating at the level of primary production. For 2019/20 these are producers of micro leaves, baby leaves, herbs, watercress, lettuce, spinach, strawberries, salad onions, radishes, celery, and chicory.

Priority 7: Verification and validation of effective systems and controls at higher-risk, ready-to-eat food businesses establishments operating at the level of primary production

One of the recommendations from a European Commission [audit](#) of the UK, which evaluated the system of official controls relating to microbial safety of primary products of non-animal origin (FNAO), was that controls must adequately take into account identified risks to food safety, in light of EFSA [opinions](#) on the microbiological hazards presented in ready to eat foods.

LAs are expected to give priority to the verification and validation of effective systems and controls at higher-risk, ready-to-eat food businesses establishments operating at the level of primary production. With a particular focus on:

- a) confirming the water source is potable or clean, wherever necessary, to prevent contamination.
- b) verifying there are records in place, and maintained, relating to control hazards in an appropriate manner, in particular any use of plant protection products and biocides, occurrence of pests and disease and the results of any relevant analyses carried out on samples that have importance to human health
- c) ensuring staff handling foodstuffs are in good health and undergo training on health risks
- d) ensuring, as far as possible, appropriate measures are in place to prevent animals and pests from causing contamination

National Targeted Monitoring Strategy (NTMS) for Animal Feed and Food Hygiene at Primary Production

The NTMS approach for 2019/20 has been informed by:

- the findings of the AFTA 2019, in respect of feed business establishments
- the level of current compliance of the food or feed business establishment
- whether the food or feed the establishment benefits from Type 1 or Type 2 Earned Recognition

Table 1: NTMS Intervention Type and Frequency

Feed business establishment type	Level of Current Compliance		
	Satisfactory Not a member of an FSA Approved assurance scheme	Broad compliance Not a member of an FSA Approved assurance scheme	At least satisfactory compliance A member of an FSA Approved assurance scheme
Frequency and type of intervention			
R13	0.75% Inspection or audit	0.5% Inspection or audit	0.25% Inspection or audit
R14	0.75% Inspection or audit	0.5% Inspection or audit	0.25% Inspection or audit

LAs are expected to:

- examine any former foodstuffs/co-products being used for feed to ensure it is:
 - not contaminated
 - does not contain prohibited substances⁵
 - being sourced from a registered feed business establishment
- check compliance with the record keeping requirements detailed in Annexes I and II of Regulation (EC) 1831/2003 laying down requirements for feed hygiene, as applicable to the establishment

⁵ Annex III of Regulation (EC) No 767/2009 on the placing on the market and use of feed

Guidance

ACTSO National Inspection Co-producer [guidance](#)

ACTSO national co-producer inspection [form](#) and data collection [form](#) (non-conformances identified during interventions)

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

[Codex Alimentarius Standards](#) relevant to feed

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

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

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

EU Codes of Good Practice on [food producing animal](#) and [pet food](#) labelling and [FSA guidance](#)

EU community [guide](#) to good practice for feed additive and premixture operators

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

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

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

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

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

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

[Salmonella auditor checklist](#)

[Salmonella factsheet](#)

FSA [guidance](#) on the presence of food grade packaging material in feed in September 2013

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

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

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

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

Industry Standards

- Red Tractor Assurance [Scheme Standards](#)
- AIC Feed Material Assurance Scheme Standards ([FEMAS](#));
- AIC Universal Feed Assurance Scheme ([UFAS](#));
- AIC Trade Assurance Scheme for Combinable Crops ([TASCC](#)); and
- [BRC Voluntary Module 9](#) – Management of Food Materials for Animal Feed.

Imported Feed

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

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

A list of DPEs and DPIs applicable to imports of animal feed can be found on our [website](#)

Food Hygiene Primary Production Guidance

Private Water Supply [Guidance](#)

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

Primary Production Food Hygiene – Enforcement [Guidance](#) for Fresh Fruit and Vegetable Production

Primary Production – Food Hygiene Compliance Score Guidance

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

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

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

[Guidance on record keeping requirements](#)

[Guide](#) to Primary Production Food and Feed Hygiene Inspections (Food Standards Scotland)

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

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

Appendix D – Corporate Priorities and outcomes of partner local authorities

Bridgend County Borough Council

City of Cardiff Council

Vale of Glamorgan Council



Corporate Priorities

- Supporting a successful economy;
- Helping people to be more self reliant;
- Smarter use of resources

- Working for Cardiff;
- Working for Wales;
- Working for the future;
- Working for public services

- Reducing poverty and social inclusion;
- Providing decent homes and safe communities;
- Promoting regeneration, economic growth and employment;
- Promoting sustainable development and protecting our environment;
- Raising overall standards of achievement;
- Valuing culture and diversity;
- Encouraging and promoting active and healthy lifestyles;
- Safeguarding those that are vulnerable and promoting independent living.

Corporate Outcomes

- Supporting a successful economy;
- Helping people to become more self reliant;
- Smarter use of resources

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

- An inclusive and safe Vale;
- An environmentally responsible and prosperous Vale;
- An aspirational and culturally vibrant Vale;
- An active and healthy Vale.

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