



Hampshire
County Council

Trading Standards Service

Feed and Food Controls Service Plan

2016 – 2017

This Service Plan is issued under the authority of:

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Official Feed and Food Controls Service Plan

1. Service Aims and Objectives

<p>1.1 Aims and Objectives</p>	<p>Aims:</p> <p>To achieve compliance through working with business</p> <p>Objectives:</p> <ul style="list-style-type: none">• To support businesses with compliance with food standards and animal feeding stuff legislation.• To carry out an effective risk-based programme of sampling, analysis and checking of food and animal feeding stuffs for composition and labelling.• To respond to consumer complaints about the composition and quality of feed and foods• To work in partnership with central government, other local government agencies and industry in order to provide a seamless service to customers• To carry out specific campaigns to highlight potential areas of good or bad practice in food trade to the public.• To carry out Feed and Food Standards Interventions in accordance with Food Standards Agency (FSA) and National Trading Standards (NTS) risk assessments and having regard to best practice in Quality Management principles
<p>1.2 Links to corporate objectives and plans</p>	<p><u>Hampshire safer and more secure for all</u></p> <ul style="list-style-type: none">• Ensuring food is safe to eat and correctly labelled• Reducing crime relating to Food Standards• Ensuring feed supplied is accurately described and free from health risks <p><u>Maximising wellbeing</u></p> <ul style="list-style-type: none">• Promoting good public health through ensuring correct labelling and compliance with legal standards• Ensuring feed supplied meets legal requirements and does not adversely impact the food chain• Supporting Hampshire's food and farming businesses, promoting good quality food production, with a "farm to fork" approach

	<p><u>Enhancing our quality of place</u></p> <ul style="list-style-type: none"> Promoting high standards in agricultural and farming practices
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2. Background

<p>2.1 Profile of Local Authority</p>	<ul style="list-style-type: none"> Hampshire is predominantly rural with Andover, Basingstoke, Winchester, Aldershot, Farnborough, Fareham and Eastleigh being the main urban areas Hampshire County Council provides essential Services for the 1.32 million people living in Hampshire The County Council delivers a wide range of services including children services, adult services, libraries, museums, country parks and trading standards Although 85% of the County is classified as rural, Hampshire County Council is responsible for regulating some 31,000 premises including 9298 food establishments and 4877 livestock premises.
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<p>2.2 Organisational Structure</p>	<pre> graph TD H[Head of Trading Standards] --> TM1[Trading Standards Manager] H --> TM2[Trading Standards Manager] TM1 --> O[Operations Team] TM1 --> LC[Legal & Compliance Team] TM2 --> R[Regulatory Team] TM2 --> S[Safeguarding Team] O --> IE[Intelligence & Early Intervention Section] O --> MI[Major Investigations Section] O --> DC[Doorstep Crime Section] O --> AH[Animal Health Section] R --> BS[Business Support Section] R --> P[Proactive Section] </pre> <p>The Head of Trading Standards and Senior Managers set the Enforcement Policy and Service priorities.</p> <ul style="list-style-type: none"> The Head of Trading Standards, in conjunction with relevant staff formulate a yearly Feed and Food Controls Service Plan to include inspection, action to redress complaints, sampling and campaign activities. Specialist staff in the Regulatory Team deliver, monitor and review all food and feed control work. The Feed and Food Controls Service Plan is delivered by specialist staff working closely with food scientists, analysts and
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	<p>technologists from the Public Analyst Laboratory (Hampshire Scientific Service).</p>
<p>2.3 Scope of the Feed and Food Service</p>	<ul style="list-style-type: none"> • Employees of Hampshire County Council Trading Standards Service and Hampshire County Council Scientific Service deliver the Food Enforcement Function. • Employees of Hampshire County Council Trading Standards Service deliver the Feed Enforcement Function. This work is supplemented by regional feed officers who will undertake some inspections. • The County Council has no responsibility for food hygiene enforcement. This is the responsibility of the District, Borough and City Council Environmental Health Services. However, there is a duty placed upon the Trading Standards Service to enforce food hygiene at primary production level, for example livestock and arable farms. • Hampshire Scientific Service has a contractual relationship with various Environmental Health Services to carry out examination of certain food products submitted to them. This plan also includes all agricultural enforcement and feed activities, so represents a “farm to fork” approach to food law enforcement. • Where appropriate, other relevant inspections (for example, product safety, pricing and weights and measures) are carried out at the time of the feed or food standards inspection. This will depend upon the premise type and the risk assessment attached to that premise. This provides a single inspection by the Trading Standards Service of feed and food premises in Hampshire. <p>The relevant areas of the food service are delivered as follows:</p> <ul style="list-style-type: none"> • Food Standards Interventions - Food standards interventions are carried out by specialist staff that are trained and competent in food law, food science and ISO 9001 auditing techniques or by staff supervised by such specialist staff. • Feed Standards Interventions - Feed standards interventions are carried out by specialist staff that are trained and competent in feed and ISO 9001 auditing techniques or by staff supervised by such specialist staff. • Officers with specialist expertise deliver inspections in relation to hygiene at primary production level. • Food Analysis - Food analysis is carried out by the duly appointed Public Analyst for Hampshire (Hampshire Scientific Service).

	<ul style="list-style-type: none">• Food & Feed Complaints -• Complaints from consumers are initially processed by Citizens Advice Consumer Services (CACS) and, where appropriate, forwarded to Trading Standards.• Complaints from business may also be received via several sources; CACS; Government Ministry or Agency (DEFRA, FSA, APHA); the EU Commission (DG Health and Food Safety); or from another Trading Standards or local authority.• All Feed and Food complaints received by Trading Standards are assessed and either assigned to an appropriate officer for appropriate action or recorded for intelligence purposes.
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2.4 Demands on the Feed and Food Service	Food Premises Type	No. of Premises				
		2013	2014	2015	2016	
	Primary producer	646	700	1186	959	
	Manufacturer/Packer	570	591	599	619	
	Importer/Exporter	35	39	41	37	
	Distributor/Wholesaler	232	246	246	264	
	Supermarket/Hypermarket	295	323	331	331	
	Small retailer	1714	1733	1750	1780	
	Retailers other	67	71	72	90	
	Restaurant	1046	1175	1237	1305	
	Hotel/guest house	55	54	60	76	
	Pub/Club	2012	1973	1963	1954	
	Take away	829	865	871	879	
	Catering Establishment	23	30	30	30	
	School/College	507	507	506	521	
	Mobile Food Unit	242	301	301	308	
	Restaurant & caterers	95	95	97	145	
	TOTAL	8368	8703	9290	9298	
		Feed Premises	No. of Premises			
		2013	2014	2015	2016	
	FSA – Primary Producers (LAEMS)	213	218	315	330	
	FSA - Livestock Farms (LAEMS)	3994	3957	3870	3845	
	FSA - Manufacturers and Packer	26	32	34	34	
	FSA - Food Businesses selling	103	123	124	125	

FSA - Importers Non EU (LAEMS)	2	4	6	6	
FSA - Distributors/Transporter	43	43	44	54	
FSA - Stores (LAEMS)	3	6	7	7	
FSA - Retailers (LAEMS)	974	944	936	930	
TOTAL	5358	5327	5336	5331	

Trading Standards Service	Address	Telephone	Opening Hours
Regulatory Team	Montgomery House Monarch Way Winchester SO22 5PW	01962 833620	9am - 5pm Monday to Friday
Operations Team	Montgomery House Monarch Way Winchester SO22 5PW	01962 833620	9am - 5pm Monday to Friday (Duty Officer)
Public Analyst & Laboratory Service	Hampshire Scientific Service, Hyde Park Road, Southsea, PO5 4LL	02392 829501	9am-5pm Monday to Friday

2.5 Regulation Policy	<ul style="list-style-type: none"> • A link to Hampshire Trading Standards enforcement policy is available at http://www3.hants.gov.uk/tradingstandards/ts-enforcement-policy.htm • The Enforcement Policy encompasses the requirements of the Regulators Compliance Code. • Internal procedures also incorporate a policy on potential
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conflicts of interest in respect of County Council premises.

3. Service Delivery

<p>3.1 Interventions at Food and Feeding stuffs establishments</p>	<ul style="list-style-type: none"> • Interventions at trade premises will have regard to published Food Standards Agency guidelines. • Samples may, however, be taken from premises outside the inspection programme. • The main recording programme Civica APP has been migrated to the FSA Code of Practice risk assessment schemes for Feed and Food businesses. • The 2016/17 LAEMS return will reflect the changes made to the risk levels and inspection visit frequency. • High-risk visits will only be conducted by those officers who satisfy the criteria set out in the Enforcement Code of Practice. • Resources will be concentrated on inspections of high risk premises. • Certain medium risk premises will be inspected in line with the Regulators Compliance Code. The target for medium risk reflects the County Council's response for better regulation in targeting those areas which intelligence suggests would require the highest priority. • Inspections at low risk premises will only be conducted where it is necessary to follow up a request by the business, a complaint or as part of a special project.
<p>3.2 Feed and Food Complaints</p>	<ul style="list-style-type: none"> • Feed and food complaints are investigated by Hampshire Trading Standards in line with documented procedures. • In accordance with the Enforcement Code of Practice, procedures have been agreed and implemented, through the Hampshire and Isle of Wight Food Liaison Group for the transfer of complaints
<p>3.3 Home Authority Principle and Primary</p>	<ul style="list-style-type: none"> • Hampshire Trading Standards Service accepts intelligence from other Authorities about businesses based in Hampshire. Any response and action will be in line with local priorities.

<p>Authority Partnership Scheme</p>	<ul style="list-style-type: none"> • Primary Authority Partnerships are available to businesses where appropriate.
<p>3.4 Providing advice to Business</p>	<ul style="list-style-type: none"> • Trading Standards provides advice and information to all Hampshire based businesses on a reactive and proactive basis. <p>General compliance advice is provided as follows:</p> <ul style="list-style-type: none"> • During inspections and visits • Over the telephone • In writing (For example, by email or letter) • Dedicated internet pages on the Hampshire County Council websites • Dialogue with businesses and contact via the Hampshire Trading Standards Service Trader Approval Scheme, Buy With Confidence • Presentations and seminars (For example Farmers Markets, Forest Friendly Farming) • Approaches are also made to new food businesses so that advice and support can be given as a form of pre-emptive enforcement • Where appropriate there are links on the Hampshire Trading Standards Service website to other sites including government websites • A charge will be made in accordance with Service policy on Charging for Business advice (http://www3.hants.gov.uk/tradingstandards/tradingstandards-business/tsguide-business-charging.htm).
<p>3.5 Feed and Food Sampling</p>	<ul style="list-style-type: none"> • Significant emphasis is placed on feed and food sampling and the analysis of samples as an enforcement tool. This has been demonstrated by consistent levels of sampling for many years. • There is a commitment to sample a proportion of feed and foods particularly from Hampshire based or Primary Authority businesses who import products. • Hampshire participates in National sampling programmes delivered through TSSEL (see 3.8 below). • The Hampshire County Council Scientific Service plays a major role in coordinating a number of other authorities in the region involved in the Food Standards Agency National Co-Ordinated Food Sampling Programme. <p>Sampling will be conducted where appropriate, as follows:</p> <ul style="list-style-type: none"> • As a feature of Feed and Food premises inspections including Hampshire based businesses. Priority is given to

	<p>sampling at Hampshire based manufacturers. Statistical sampling is performed if necessary at manufacturers and importers</p> <ul style="list-style-type: none"> • During the approval process of feeding stuffs establishments and intermediaries • In response to complaints • For identified internal, regional and national projects • As a result of intelligence identifying a hazard, for example, adulterated or contaminated food; where marketing is misleading, fraudulent or deceptive or where a product is incorrectly labelled or does not meet legal compositional standards. • Priority is given to foods and feeds produced or manufactured in Hampshire or imported into Hampshire • Sampling work is conducted to determine compliance with feed and food standards and to monitor the effectiveness of manufacturing controls and associated quality systems • Some of those will be formal samples, taken in accordance with the procedures set out in the Food Enforcement Code of Practice. However, the majority will be informal samples • The examination and analysis of the samples is carried out by Hampshire County Council Scientific Service at their laboratory in Southsea and by its partner laboratory Kent Scientific Service based in West Malling in Kent. Most animal feeds and samples for pesticide residue tests are analysed at the latter <p>See Appendix I and II for feed and food sampling projects</p>
<p>3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease</p>	<ul style="list-style-type: none"> • Whilst recognizing Hampshire Trading Standards Service has no direct responsibility in relation to outbreaks and food related infectious diseases, it will liaise and assist, where appropriate, those authorities to which such responsibility is given. • All food specialist staff are authorised by the Minister under the Food and Environment Protection Act to deal with any food related environmental problems.
<p>3.7 Feed/Food Safety Incidents</p>	<ul style="list-style-type: none"> • Hampshire Trading Standards Service will act in accordance with the Food Enforcement Code of Practice and internal procedures to: <ul style="list-style-type: none"> • Identify and report feed and food hazards • Respond to Food Alerts issued by the FSA

<p>3.8 Liaison with Other Organisations</p>	<ul style="list-style-type: none"> • Hampshire Trading Standards Service adheres to the principles of the Enforcement Concordat and a Prosecution Policy has been established following appropriate consultation and discussion with other Trading Standards Services in the region. • Trading Standards South East Ltd (TSSEL) is a Regional Group that includes 19 authorities. Hampshire Trading Standards Service plays an active part within TSSEL and it is used as a vehicle to co-ordinate feed and food sampling and promote best practice. It provides the opportunity for more efficient sampling programmes, training and education activities. The groups aim to ensure consistent enforcement across the different authorities. • Hampshire Trading Standards Service is represented at the Hampshire and Isle of Wight Food Liaison Group. The Group comprises representatives of the ten Environmental Health Departments in the County plus the three neighbouring Unitary Authorities. • Hampshire Trading Standards Service is a Member of the Camden and Chorleywood Food Research Association, which provides specialist information, advice and training relating to food control.
<p>3.9 Feed and Food Safety and Standards promotional work, and other non-official controls interventions</p>	<ul style="list-style-type: none"> • Some food sampling campaigns will result in ad-hoc awareness campaigns. The effectiveness of promotional activities can be evaluated via feedback from the public and businesses, the uptake of sampling campaigns by food authorities and the level of resultant media interest. • Media requests are dealt with through Hampshire County Council Corporate Communications. However, Hampshire Trading Standards Service has its own Twitter account that will be used to highlight topical issues regarding food related issues. • Hampshire Trading Standards Service has a comprehensive selection of guidance leaflets for businesses and consumers on feed and food related topics that are available to download from the Hampshire County Council website. Where appropriate there are links to other relevant websites including government websites.

4. Resources

<p>4.1 Financial Allocation</p>	<ul style="list-style-type: none"> Hampshire Trading Standards Service Management Team is responsible for the allocation and delegation of budgets allocated to the feed and food enforcement functions. 												
<p>4.2 Staffing Allocation</p>	<ul style="list-style-type: none"> The table below summarises the staffing levels available, qualified and competent for feed and food enforcement as at April 2016. <table border="1" data-bbox="469 591 1409 857"> <thead> <tr> <th>Function</th> <th>FTE</th> </tr> </thead> <tbody> <tr> <td>Management</td> <td>0</td> </tr> <tr> <td>Operational Field Officers (Food Standards)</td> <td>2.9</td> </tr> <tr> <td>Operational Field Officers (Feed)</td> <td>0.9</td> </tr> <tr> <td>Support Staff</td> <td>0.25</td> </tr> <tr> <td>TOTAL</td> <td>4.40</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Each Trading Standards Officer working on feed and food enforcement is appropriately qualified and competent in accordance with the Food Enforcement Code of Practice. Acceptable qualifications include Diploma in Consumer Affairs and Trading Standards (DCATS), Diploma in Trading Standards (DTS) or Diploma in Consumer Affairs (DCA). Each member of staff has undertaken Basic Food Hygiene Training and a number of officers have undertaken ISO 9001 Lead Assessor training. 	Function	FTE	Management	0	Operational Field Officers (Food Standards)	2.9	Operational Field Officers (Feed)	0.9	Support Staff	0.25	TOTAL	4.40
Function	FTE												
Management	0												
Operational Field Officers (Food Standards)	2.9												
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Support Staff	0.25												
TOTAL	4.40												
<p>4.3 Staff Development Plan</p>	<ul style="list-style-type: none"> Training needs are identified by examining: <ul style="list-style-type: none"> Operational requirements arising from the Service Plan Individual needs highlighted at Valuing Performance (VP) Reviews Each individual member of staff has a Valuing Performance review with their line manager when performance goals are set for the following year. Training and development needs are assessed at this time and throughout the year when interim reviews are carried out. Managers will establish the training needs of all staff within their specific teams. In accordance with the Food & Feed Enforcement Codes of Practice each authorised officer must also undertake 20 hours training per year, at least 10 hours in the core subject, in order to maintain competency. How these needs are met will vary, but sources of training 												

	<p>include:</p> <ul style="list-style-type: none"> • Courses leading to an appropriate qualification • Refresher and updates, internal and external • E learning & self-learning <ul style="list-style-type: none"> • Training must be approved by a manager before it is undertaken and it is evaluated after the event.
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5. Quality Assessment

<p>5.1 Quality assessment and internal monitoring</p>	<ul style="list-style-type: none"> • Internal monitoring will be conducted every quarter to assess the performance of Hampshire Trading Standards Service against the plan and the FSA Framework Standard. • Hampshire Scientific Service is UKAS accredited to the EN ISO/ IEC 17025 standard and participates in external proficiency schemes, for example, FAPAS.
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6. Review

<p>6.1 Review against the Service Plan</p>	<ul style="list-style-type: none"> • Hampshire Trading Standards Service has adopted the National Trading Standards (NTS) Intelligence Operating Model (IOM) approach to the prioritisation and allocation of work. • The Feed and Food Controls Service Plan is set against the Hampshire Trading Standards Services Priorities and performance indicators will include: <ul style="list-style-type: none"> • Interventions for High Risk premises against target • Interventions for Medium Risk premises against target • Numbers of samples taken against target • Outcomes of campaigns and promotional activities • Response to feed and food complaints • Reactive work • Priorities and resource requirements are reviewed at the monthly Hampshire Trading Standards Service Tactical Tasking and Co-ordination Group (TTCG) meetings. At these meetings decisions are made regarding the deployment of resources, including those needed for formal investigations. • The Feed and Food Controls Service Plan is also subject to a quarterly and an annual review where an assessment is made of progress and outcomes are evaluated.
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	<ul style="list-style-type: none"> • The end of year review includes an assessment against the previous year's plan as a means to measure improvement.
<p>6.2 Identification of any Variation from the Service Plan</p>	<ul style="list-style-type: none"> • At review meetings any variance in the plan will be examined and the reasons considered. • These variances will be documented and where additional 'non-planned' work has met the desired objective this will be recorded. This may include an outbreak of a notifiable disease, for example, in the past Foot and Mouth disease had a major impact on the Food and Agriculture Plan.

Appendix I

1) HCC Food Samples

Description		Number
High risk premises – appropriate to the business and potential risk		50
Nutritional labelling – new requirement for most prepacked foods in force 13/12/16	Accuracy of label	30
Claims – especially “gluten free” as issues found last year	Accuracy of claim and compliance	30
Meat product – not been checked recently	Meat content	20
Chocolate – new levels for cadmium will be coming into force so market place surveillance to see if it will be a problem	Cadmium levels	10
At point of entry – imported food where labelling may be amended prior to sale but composition can not be changed	Additive levels	10
Salads (dependent on decision on levels)	Chlorate levels	10
Foreign labelled products	Additive levels or Allergens	10

2) TSSE /FSA Food Samples

Details not yet available, but we will participate in these to the level resources allow.

Appendix II

TSSE/ FSA Feed samples and Inspection

Description	Number of samples
Dioxins Suite (Dioxins, DL-PCBs, NDL-PCBs)	3
Heavy Metal Suite (Cadmium, Arsenic, Lead, Mercury)	8
Mycotoxins Suite (Aflatoxin B1 (AFB1), FUM B1 & B2, T2 & HT-2, DON & ZON, Ochratoxin A)	4
Pesticide residues	4
Salmonella species	4
Unauthorised GMs	1