



# Hampshire County Council

## Trading Standards Service

### Feed and Food Controls Service Plan

2019 – 2020

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><b>Aims:</b></p> <p>To proactively protect consumers by ensuring a fair and safe market place that supports business to compete, thrive and prosper</p> <p><b>Objectives:</b></p> <ul style="list-style-type: none"> <li>• To support businesses with compliance with food standards and animal feeding stuff legislation.</li> <li>• To carry out an effective intelligence led and risk-based programme of inspection, sampling and analysis of food and animal feeding stuffs for composition, standards and labelling.</li> <li>• To assess and, where appropriate, respond to consumer complaints about the composition and quality of feed and foods.</li> <li>• To work in partnership with central government, other local government agencies and industry in order to provide a seamless service to customers.</li> <li>• Where appropriate to carry out specific campaigns to highlight potential areas of good or bad practice in feed and food supply.</li> <li>• To carry out feed and food standards interventions with regard to Food Standards Agency (FSA) and National Trading Standards (NTS) risk assessments and having regard to best practice in Quality Management principles</li> </ul>
<p>1.2 Links to corporate objectives and plans</p>	<p><u>People in Hampshire live safe, healthy and independent lives</u></p> <ul style="list-style-type: none"> <li>• Ensuring food is safe to eat and correctly labelled</li> <li>• Reducing crime relating to food standards</li> <li>• Ensuring feed supplied is accurately described and free from health risks</li> <li>• Promoting good public health through ensuring correct labelling, information and compliance with legal standards</li> </ul> <p><u>People in Hampshire enjoy a rich and diverse environment</u></p> <ul style="list-style-type: none"> <li>• Ensuring feed supplied meets legal requirements and does not adversely impact the food chain</li> <li>• Promoting high standards in agricultural and farming practices</li> </ul>

	<p><u>Hampshire maintains strong and sustainable economic growth and prosperity</u></p> <ul style="list-style-type: none"> <li>Supporting Hampshire’s food and farming businesses, promoting good quality food production, with a “farm to fork” approach</li> </ul>
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2. Background

<p>2.1 Profile of Local Authority</p>	<ul style="list-style-type: none"> <li>Hampshire is predominantly rural with Andover, Basingstoke, Winchester, Aldershot, Farnborough, Fareham and Eastleigh being the main urban areas</li> <li>Hampshire County Council provides essential Services for the 1.36 million people living in Hampshire</li> <li>The County Council delivers a wide range of services including children services, adult services, libraries, museums, country parks and trading standards</li> <li>Although 85% of the County is classified as rural, Hampshire County Council is responsible for regulating some 31,000 premises including over 9000 food establishments and 4203 livestock premises.</li> </ul>
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<p>2.2 Organisational Structure</p>	<pre> graph TD     HRS[Head of Regulatory Services] --&gt; TSM1[Trading Standards Manager]     HRS --&gt; TSM2[Trading Standards Manager]     TSM1 --&gt; OT[Operations Team]     TSM1 --&gt; LCT[Legal &amp; Compliance Team]     OT --&gt; IES[Intelligence &amp; Early Intervention Section]     OT --&gt; MIS[Major Investigations Section]     OT --&gt; DCS[Doorstep Crime Section]     OT --&gt; AS[Animal Health Section]     TSM2 --&gt; RT[Regulatory Team]     TSM2 --&gt; ST[Safeguarding Team]     RT --&gt; BSS[Business Support Section]     RT --&gt; PS[Proactive Section] </pre> <p>The Head of Regulatory Services and Senior Managers set the Enforcement Policy and Service priorities.</p> <ul style="list-style-type: none"> <li>The Head of Regulatory Services, 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.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Specialist staff in the Regulatory Team deliver, monitor and review all food and feed control work.</li> <li>• The Feed and Food Controls Service Plan is delivered by specialist staff working closely with food scientists, analysts and technologists from the Public Analyst Laboratory (Hampshire Scientific Service).</li> </ul>
<p>2.3 Scope of the Feed and Food Service</p>	<ul style="list-style-type: none"> <li>• Employees of Hampshire County Council Trading Standards Service and Hampshire County Council Scientific Service deliver the Food Enforcement Function.</li> <li>• Employees of Hampshire County Council Trading Standards Service deliver the Feed Enforcement Function. This work is supplemented by contracted feed officers and/or contractors who will undertake some inspections.</li> <li>• The County Council has no responsibility for food hygiene enforcement. This is the responsibility of the District, Borough and City Council Environmental Health Services.</li> <li>• 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.</li> <li>• Where appropriate, other relevant inspections (for example, weights and measures, pricing and product safety) 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.</li> </ul> <p>The relevant areas of the food service are delivered as follows:</p> <ul style="list-style-type: none"> <li>• <b>Food Standards Interventions</b> - 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.</li> <li>• <b>Feed Standards Interventions</b> - 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.</li> <li>• <b>Food Analysis</b> - Food analysis is carried out by the duly appointed Public Analyst for Hampshire (Hampshire Scientific Service).</li> </ul>

- **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.

2.4 Contact details	<b>Service</b>	<b>Address</b>	<b>Telephone</b>	<b>Opening Hours</b>
	Trading Standards	Montgomery House Monarch Way Winchester SO22 5PW	01962 833620	9am - 5pm  Monday to Friday
	Public Analyst & Laboratory	Hampshire Scientific Service, Hyde Park Road Southsea PO5 4LL	02392 829501	9am-5pm Monday to Friday

2.5 Demands on the Feed and Food Service

<b>Food Premises Type</b>			
	<b>2016</b>	<b>2017</b>	<b>2018</b>
Primary producer	959	441	410
Manufacturer/Packer	619	647	666
Importer/Exporter	37	35	38
Distributor/Wholesaler	264	266	265
Supermarket/Hypermarket	331	338	342
Small retailer	1780	1793	1812
Retailers other	90	90	101
Restaurant	1305	1370	1448
Hotel/guest house	76	89	94
Pub/Club	1954	1957	1944
Take away	879	892	906
Catering Establishment	30	29	29
School/College	521	521	520
Mobile Food Unit	308	310	315
Restaurant & caterers	145	147	149
<b>TOTAL</b>	<b>9298</b>	<b>8925</b>	<b>9039</b>

The table below is the distribution of the Feed Code of Practice codes:

<b>Feed Premises</b>	<b>No. of Premises</b>
R1-Manufacture &/or Place on Market Feed Additives	2
R4-Manufacture of Compound Feeding Stuffs	6
R5-Placing on Market of Compound Feeds	48
R6-Manufacture of Pet Foods	26
R7-Manufacture &/or Place on Market Feed	178

	Materials	
	R8-Transport of Feed & Feed Products	40
	R9-Storage of Feed & Feed Products	70
	R10-Mix Feed on Farm with Additives and Premixes	10
	R11-Mix Feeds on Farm with Comp Feeds Containing Additives	48
	R12-Food Business Selling Co Products As Feed Materials	32
	R13-Livestock Farm Not Mixing, or Mixing Without Additives	2413
	R14-Arable Farm Growing or Selling Crops For Feed	156
	<b>TOTAL</b>	<b>3029</b>
2.6 Regulation Policy	<ul style="list-style-type: none"> <li>• A link to Hampshire Trading Standards enforcement policy is available at <a href="https://www.hants.gov.uk/business/tradingstandards/aboutus/enforcementpolicy">https://www.hants.gov.uk/business/tradingstandards/aboutus/enforcementpolicy</a></li> <li>• The Enforcement Policy encompasses the requirements of the Regulators Compliance Code.</li> <li>• Internal procedures also incorporate a policy on potential conflicts of interest in respect of County Council premises.</li> </ul>	

### 3. Service Delivery

3.1 Interventions at Food and Feeding stuffs establishments	<ul style="list-style-type: none"> <li>• Interventions at trade premises will have regard to published Food Standards Agency guidelines.</li> <li>• Samples may, if necessary, be taken from premises outside the inspection programme.</li> <li>• High risk visits will only be conducted by those officers who satisfy the criteria set out in the Enforcement Code of Practice.</li> </ul>
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	<ul style="list-style-type: none"> <li>Resources will be allocated on an intelligence led basis and directed to those premises presenting the most risk to the safety and wellbeing of Hampshire residents.</li> <li>Due regard will be given to the FSA Code of Practice, but premises will primarily be visited in line with local enforcement priorities, to follow up a request by the business for chargeable services or to investigate a consumer complaint which highlights a risk to the safety and wellbeing of Hampshire residents.</li> </ul>
3.2 Feed and Food Complaints	<ul style="list-style-type: none"> <li>Feed and food complaints are investigated by Hampshire Trading Standards in line with documented procedures.</li> <li>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</li> </ul>
3.3 Home Authority Principle and Primary Authority Partnership Scheme	<ul style="list-style-type: none"> <li>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.</li> <li>Hampshire Trading Standards Service does not offer Home Authority arrangements, however, Primary Authority Partnerships are available to businesses where appropriate.</li> </ul>
3.4 Providing advice to Business	<p>Trading Standards provides advice and information to all Hampshire based businesses on a reactive and proactive basis.</p> <p>General compliance advice may be provided as follows:</p> <ul style="list-style-type: none"> <li>During inspections and visits</li> <li>Over the telephone</li> <li>In writing (for example, by email or letter)</li> <li>Dedicated internet pages on the Hampshire County Council websites</li> <li>Dialogue with businesses and contact via the Hampshire Trading Standards Service Trader Approval Scheme, Buy With Confidence</li> <li>Presentations and seminars (For example Farmers Markets, Forest Friendly Farming)</li> <li>Where appropriate, approaches are also made to new food businesses so that advice and support can be given as a form of pre-emptive enforcement</li> <li>Where appropriate there are links on the Hampshire Trading Standards Service website to other sites including government websites</li> </ul>



	<ul style="list-style-type: none"> <li>For some services a charge will be made in accordance with Service policy on Charging for Business advice  <a href="https://www.hants.gov.uk/business/tradingstandards/businessadvice">https://www.hants.gov.uk/business/tradingstandards/businessadvice</a></li> </ul>
3.5 Food projects	<p>A number of proactive projects will be undertaken throughout the year both to assess compliance of Hampshire based businesses and gather intelligence of areas of non-compliance or consumer detriment</p> <ul style="list-style-type: none"> <li>Visits to catering premises to check compliance with the requirements of Food Information Regulations in relation to allergen information – minimum of 250 visits, including revisits as necessary and test purchases where appropriate  These visits will include schools, both those supplied by HC3S and other suppliers.</li> <li>Undisclosed GM oil at caterers – minimum 50 visits (combined with allergen information inspection where appropriate).</li> <li>Farmers/food markets – focusing on allergens information and authenticity of local claims – minimum 30 stalls visited</li> <li>Market surveillance of shops which may sell foreign labelled food products with no English labelling – minimum 35 visits</li> <li>Visits to high risk premises will only be undertaken where it is considered appropriate/necessary.</li> </ul> <p>It is envisaged that there will be a number of emerging issues throughout the year that may require enforcement activity, eg Brexit, CBD oil products, changes to allergens information requirements. The visits target numbers have been set to allow some flexibility throughout the year to address such issues where it becomes necessary. If there is any excess capacity this will be directed towards additional allergens inspections.</p>
3.6 Feed inspections	<p>Feed inspection work will be carried out in line with the Food Standards Agency feed delivery programme and the national enforcement priorities. This work is funded by the Food Standards Agency.</p> <p>The following visits will be undertaken:</p> <ul style="list-style-type: none"> <li>Inland feed visits – 79</li> <li>Primary production farm visits – 28</li> <li>RTE high risk primary production visits - 26</li> </ul>
3.7 Feed and Food Sampling	<p>Sampling will be conducted where appropriate, as follows:</p>

	<ul style="list-style-type: none"> <li>• As part of enforcement work at catering premises to check compliance with the requirements of Food Information Regulations in relation to allergen information</li> <li>• During the approval process of feeding stuffs establishments and intermediaries</li> <li>• In response to complaints, where required</li> <li>• For identified internal, regional and national projects</li> <li>• 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.</li> <li>• Priority is given to foods and feeds produced or manufactured in Hampshire or imported into Hampshire</li> <li>• Sampling work is conducted to determine compliance with feed and food standards and to monitor the effectiveness of manufacturing controls and associated quality systems</li> <li>• Some of these will be formal samples, taken in accordance with the procedures set out in the Food Enforcement Code of Practice.</li> <li>• 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</li> </ul> <p>See Appendix I and II for feed and food sampling projects</p>
<p>3.8 Control and Investigation of Outbreaks and Food Related Infectious Disease</p>	<ul style="list-style-type: none"> <li>• Whilst recognising 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.</li> <li>• All food specialist staff are authorised by the Minister under the Food and Environment Protection Act to deal with any food related environmental problems.</li> </ul>
<p>3.9 Feed/Food Safety Incidents</p>	<ul style="list-style-type: none"> <li>• 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"> <li>• Identify and report feed and food hazards</li> <li>• Respond to Food Alerts issued by the FSA, where appropriate</li> </ul> </li> </ul>

<p>3.10 Liaison with Other Organisations</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<p>3.11 Feed and Food Safety and Standards promotional work, and other non-official controls interventions</p>	<ul style="list-style-type: none"> <li>• Some food sampling campaigns may 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.</li> <li>• 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.</li> <li>• Hampshire Trading Standards Service has a comprehensive selection of information 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.</li> </ul>

## 4. Resources

4.1 Financial Allocation	Hampshire Trading Standards Service Management Team is responsible for the allocation and delegation of budgets allocated to the feed and food enforcement functions.												
4.2 Staffing Allocation	<p>The table below summarises the staffing levels available, qualified and <b>competent</b> for feed and food enforcement as at April 2017.</p> <table border="1" data-bbox="467 551 1409 817"> <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>3.0</td> </tr> <tr> <td>Operational Field Officers (Feed)</td> <td>1.0</td> </tr> <tr> <td>Support Staff</td> <td>0.10</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>4.10</b></td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>• Each Trading Standards Officer working on feed and food enforcement is appropriately qualified and competent in accordance with the Food Enforcement Code of Practice.</li> <li>• Acceptable qualifications include Diploma in Consumer Affairs and Trading Standards (DCATS), Diploma in Trading Standards (DTS) or Diploma in Consumer Affairs (DCA).</li> <li>• Each member of staff who undertakes food standards work has undertaken Basic Food Hygiene Training and a number of officers have undertaken ISO 9001 Lead Assessor training.</li> </ul>	Function	FTE	Management	0	Operational Field Officers (Food Standards)	3.0	Operational Field Officers (Feed)	1.0	Support Staff	0.10	<b>TOTAL</b>	<b>4.10</b>
Function	FTE												
Management	0												
Operational Field Officers (Food Standards)	3.0												
Operational Field Officers (Feed)	1.0												
Support Staff	0.10												
<b>TOTAL</b>	<b>4.10</b>												
4.3 Staff Development Plan	<p>Training needs are identified by examining:</p> <ul style="list-style-type: none"> <li>• Operational requirements arising from the Service Plan</li> <li>• Each individual member of staff has an annual 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.</li> <li>• Managers will establish the training needs of all staff within their specific teams.</li> <li>• In accordance with the Food &amp; Feed Enforcement Codes of Practice each authorised food standards officer must also undertake 20 hours training per year, at least 10 hours in the core subject, in order to maintain competency.</li> <li>• For officers conducting primary production inspections undertake training that is appropriate to the work that they</li> </ul>												

	<p>do.</p> <p>How these needs are met will vary, but sources of training include:</p> <ul style="list-style-type: none"> <li>• Courses leading to an appropriate qualification</li> <li>• Refresher and updates, internal and external</li> <li>• E learning &amp; self-learning</li> </ul> <p>Training must be approved by a manager before it is undertaken and it is evaluated after the event.</p>
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## 5. Quality Assessment

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

<p>6.1 Review against the Service Plan</p>	<ul style="list-style-type: none"> <li>• Hampshire Trading Standards Service has adopted the National Trading Standards (NTS) Intelligence Operating Model (IOM) approach to the prioritisation and allocation of work.</li> <li>• 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"> <li>• Numbers of businesses brought into compliance</li> <li>• Outcomes of projects and campaigns</li> <li>• Numbers of inspections undertaken against target</li> <li>• Response to feed and food complaints</li> <li>• Reactive work</li> </ul> </li> <li>• 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.</li> <li>• The Feed and Food Controls Service Plan is also subject to a</li> </ul>
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	<p>quarterly and an annual review where an assessment is made of progress and outcomes are evaluated.</p> <ul style="list-style-type: none"> <li>• The end of year review includes an assessment against the previous year's plan as a means to measure improvement.</li> </ul>
<p>6.2 Identification of any Variation from the Service Plan</p>	<ul style="list-style-type: none"> <li>• Any variance in the plan will be examined and the reasons considered.</li> <li>• 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.</li> </ul>

## Appendix I

### 1) HCC Food Samples

<b>Description</b>	<b>Tested for</b>	<b>Number</b>
Allergens – particularly free from claims	Accuracy of claim and compliance. As part of inspection programme, samples as appropriate	5-30
Local producers – farmers markets	As appropriate, allergens, meat content, health or nutritional claims	0-35
Market surveillance of shops which may sell foreign labelled food products with no English labelling	As appropriate	0-10
At point of entry – imported food where labelling may be amended prior to sale but composition can not be changed	Additive levels	0-10  Dependent on what foods are imported

Appendix II

**Feed samples**

<b>Description</b>	<b>Tested for</b>	<b>Number of samples</b>
At point of entry – imported feed, as identified as appropriate	Heavy metals	Up to 5  Dependent on what imported feeds are identified
Food co products for feed use	Micro	Up to 5