



Hampshire County Council

Trading Standards Service

Feed and Food Controls Service Plan

2021 – 2022

This Service Plan is issued under the authority of:

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Covid 19

The continuing Covid 19 pandemic has impacted the delivery of routine food and feed standards inspection work, given the requirement for all activities to be undertaken in a Covid safe manner. Many food businesses have been required to close, and many others have been operating with reduced activities or have closed voluntarily.

Until lockdown restrictions start to lift, food and feed standards enforcement activities will continue to be conducted remotely. Physical inspections will be recommencing when restrictions allow and it is safe to do so.

Food Standards Agency Pilot

Hampshire Trading Standards is one of 12 local authorities taking part in the Food Standards Agency (FSA) pilot of the new risk rating scheme for food businesses. The new operating model represents a fundamental change in approach, so a full and robust evaluation is necessary to assess its effectiveness before further national rollout. The FSA will use the outcomes of the pilot to evaluate how the new operating model performs against the existing model.

The new delivery model uses a Risk Matrix to determine the Regulatory Output (RO) for a food business. The RO specifies what type of intervention a business should receive (if any) and the frequency of the intervention. The Inherent Risk Profile and Compliance Assessment risk scores of a business are applied to the Risk Matrix to establish the RO.

Local authorities participating in the pilot are not required to prepare a detailed service plan for their Food Standards work for the pilot period, as this aspect of work will be included in a detailed FSA work plan.

However, as the pilot was delayed due to Covid (and will now run between January 2021 to December 2021), a service plan is included below to cover the period April 2021 to March 2022, incorporating the work undertaken as part of the pilot.

Official Feed and Food Controls Service Plan

1. Service Aims and Objectives

1.1 Aims and Objectives	Aims: To proactively protect consumers by ensuring a fair and safe marketplace that supports businesses to compete, thrive and prosper. Objectives:
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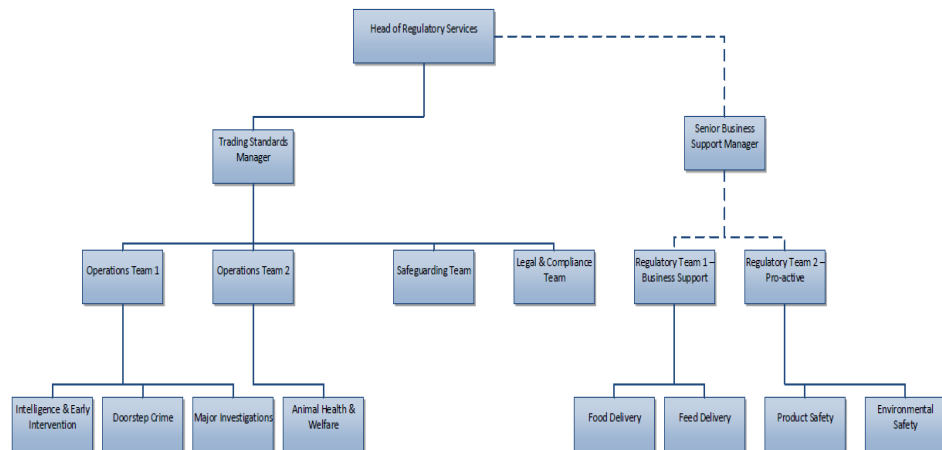
	<ul style="list-style-type: none"> • To support businesses with compliance with food standards and feed standards legislation. • To carry out an effective, intelligence led and risk-based programme of inspection, sampling and analysis of food and animal feeding stuffs for composition, standards, and labelling. • To assess and, where appropriate, 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 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
<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"> • 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 • Promoting good public health through ensuring correct labelling, information, and compliance with legal standards <p><u>People in Hampshire enjoy a rich and diverse environment</u></p> <ul style="list-style-type: none"> • Ensuring feed supplied meets legal requirements and does not adversely impact the food chain • Promoting high standards in agricultural and farming practices <p><u>Hampshire maintains strong and sustainable economic growth and prosperity</u></p> <ul style="list-style-type: none"> • Supporting Hampshire’s food and farming businesses, promoting good quality food production, with a “farm to fork” approach

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
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- Hampshire County Council provides essential Services for the 1.37 million people living in Hampshire
- The County Council delivers a wide range of services including children’s 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 over 8,500 food establishments and over 4,000 livestock premises.

2.2
Organisational
Structure



The Head of Regulatory Services and Senior Managers set the Enforcement Policy and Service priorities.

- The Head of Regulatory Services, in conjunction with relevant officers formulate a Feed and Food Controls Service Plan to include inspection, action to redress complaints, sampling and campaign activities.
- Specialist officers 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 technologists from the Public Analyst Laboratory (Hampshire Scientific Service).

2.3 Scope of
the Feed and
Food Service

- Employees of Hampshire County Council Trading Standards Service and Hampshire County Council Scientific Service deliver the Food Enforcement Function.

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- The County Council has no responsibility for food hygiene enforcement. This is the responsibility of the District, Borough and City Council Environmental Health Services.
- 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.
- Normally, where appropriate to do so, 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. During the pandemic, to minimise risk to officers and the time spent on site, inspections may need to be conducted as expediently as possible. The focus being on feed or food standards with other areas of inspections being kept to a minimum. This approach will be removed where appropriate when Covid restrictions are lifted

The relevant areas of the food service are delivered as follows:

- **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.
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- **Food Analysis** - Food analysis is carried out by the duly appointed Public Analyst for Hampshire (Hampshire Scientific Service).
- **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.

	<ul style="list-style-type: none"> All Feed and Food complaints received by Trading Standards are risk assessed and either assigned to an appropriate officer for appropriate action or recorded for intelligence purposes. 																																																							
2.4 Contact details	<table border="1"> <thead> <tr> <th>Service</th> <th>Address</th> <th>Telephone</th> <th>Opening Hours</th> </tr> </thead> <tbody> <tr> <td>Trading Standards</td> <td>Montgomery House Monarch Way Winchester SO22 5PW</td> <td>01962 833620</td> <td>9am - 5pm Monday to Friday <i>Staff currently working remotely</i></td> </tr> <tr> <td>Public Analyst & Laboratory</td> <td>Hampshire Scientific Service, Hyde Park Road Southsea PO5 4LL</td> <td>02392 829501</td> <td>9am-5pm Monday to Friday</td> </tr> </tbody> </table>	Service	Address	Telephone	Opening Hours	Trading Standards	Montgomery House Monarch Way Winchester SO22 5PW	01962 833620	9am - 5pm Monday to Friday <i>Staff currently working remotely</i>	Public Analyst & Laboratory	Hampshire Scientific Service, Hyde Park Road Southsea PO5 4LL	02392 829501	9am-5pm Monday to Friday																																											
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School/College	520	509	507
Mobile Food Unit	315	316	319
Restaurant & caterers	149	159	158
TOTAL	9039	8998	8674

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

Feed Premises	No. of Premises
A1- Manufacture &/or Place on Market of Nutritional Additives	1
A2 - Manufacture &/or Place on market of Zootechnical Additives	1
R1-Manufacture &/or Place on Market Feed Additives	2
R4-Manufacture of Compound Feeding Stuffs	9
R5-Placing on Market of Compound Feeds	71
R6-Manufacture of Pet Foods	29
R7-Manufacture &/or Place on Market Feed Materials	160
R8-Transport of Feed & Feed Products	35
R9-Storage of Feed & Feed Products	52
R10-Mix Feed on Farm with Additives and Premixes	11
R11-Mix Feeds on Farm with Comp Feeds Containing Additives	41
R12-Food Business Selling Co Products As Feed Materials	24
R13-Livestock Farm Not Mixing, or Mixing Without Additives	2279
R14-Arable Farm Growing or Selling Crops For Feed	167

	TOTAL	2881
2.6 Regulation Policy	<ul style="list-style-type: none"> • A link to Hampshire Trading Standards enforcement policy is available at https://www.hants.gov.uk/business/tradingstandards/aboutus/enforcementpolicy • The Enforcement Policy encompasses the requirements of the Regulators Compliance Code. • Internal procedures also incorporate a policy on potential conflicts of interest in respect of County Council premises. 	

3. Service Delivery

3.1 Interventions at Food and Feeding stuffs establishments	<ul style="list-style-type: none"> • Interventions at trade premises will have regard to published Food Standards Agency guidelines. • Samples may, if necessary, be taken from premises outside the inspection programme. • High risk visits will only be conducted by those officers who satisfy the criteria set out in the Enforcement Code of Practice. • The safety of officers and staff at the feed or food premises are of paramount importance. Inspections will therefore only be conducted at businesses which are considered to be “Covid safe” in accordance with our own risk assessment. This requirement is combined with the nature and risk that the business presents to the feed or food chain. • Due regard will be given to the amended FSA Code of Practice being used for the pilot, but regard will also be given to 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. 	
3.2 Feed and Food Complaints	<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
3.3 Home Authority Principle and Primary Authority Partnership Scheme	<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. • Hampshire Trading Standards Service does not offer Home Authority arrangements; however, Primary Authority Partnerships are available to businesses where appropriate.
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"> • During inspections and visits • Over the telephone • In writing (for example, by email or letter) • Dedicated internet pages on the Hampshire County Council websites • Social media channels • Dialogue with businesses and contact via the Hampshire Trading Standards Service Trader Approval Scheme, Buy With Confidence • 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 • Where appropriate there are links on the Hampshire Trading Standards Service website to other sites including government websites • For some services, a charge will be made in accordance with Service policy on Charging for Business advice https://www.hants.gov.uk/business/tradingstandards/businessadvice
3.5 Food projects	<p>Until restrictions introduced to control the spread of the Coronavirus are lifted all interventions are being undertaken remotely, these include discussions with businesses about their processes, review of labels, provision of business advice and review of websites and marketing materials.</p> <p>Once restrictions are lifted a number of proactive projects will be undertaken throughout the remaining part of the year both to assess the compliance of Hampshire based businesses, to gather intelligence of areas of non-compliance or consumer detriment and to test the new risk rating scheme. All activities will be undertaken in accordance with our own Covid risk assessment and as such may be subject to change.</p>

It is envisaged that the type of inspections that it is practicable to undertake will evolve through the year as restrictions are reduced but will be very much dependent on how the Covid situation evolves. The visit target numbers have been set to allow flexibility and will need to be reviewed and amended as appropriate.

Once it is safe to do so, visits to catering premises to check compliance with the requirements of Food Information Regulations in relation to allergen information will resume, but social distancing in these premises can be difficult due to their nature and size and may need to be delayed until restrictions allow.

- Inspections of businesses identified under the pilot as requiring priority intervention – 12 businesses
- Butchers - 20 inspections
- Start-up businesses – new food registration numbers vary but joining the FSA digital registration service has seen an increase in numbers. In the first 2 months of 2021 we received over 160, but it is hard to judge whether this has been a consequence of Covid and lockdown. Businesses receive an acknowledgement email with signposting to sources of information relevant to food standards. It is often not possible to tell from the registration the detail of what requirements will be applicable to the business. New registrations will be assessed, and contact made with those which are evaluated as posing the greatest food safety or food standards risk – minimum 50 contacts.
- Restaurants/takeaways/caterers for compliance with Food Information Regulations in relation to allergen information – the number of inspections that will be possible will depend upon when it is possible to restart inspections in a Covid safe way so will need to be kept under review – target of minimum 100 inspections
- Manufacturers/packers/importers – primary focus on allergen information – 20 inspections
- Information to businesses regarding the changes to labelling requirements from October for foods prepacked for direct sale – will be addressed at any relevant inspections and by information put out as part of Trading Standards communications plan

EU exit has as yet not generated additional demands or enquiries. This may change later in the year as changes to legislation and requirements become more apparent to businesses.

<p>3.6 Feed inspections</p>	<p>Feed inspection work is funded by the Food Standards Agency. In normal circumstances a desktop planning exercise is undertaken to establish the premises due for inspection for the financial year and funds are allocated based upon this.</p> <p>As a result of Covid the FSA have stated that no desktop exercise would take place this year to allow resources to be directed towards enforcement activity. They have indicated that the allocation of funds for 21/22 will be based upon the 20/21 submission, so will be the same or similar to last year.</p> <p>Based on this, targets for the complete year will be approx:</p> <ul style="list-style-type: none"> • Inland feed visits – 84 • Primary production farm visits – 21 • RTE high risk primary production visits – 6 • Feed mills - 2 <ul style="list-style-type: none"> • The situation as to whether butchers can sell raw meat for pet food directly to the end users is unclear and clarification is awaited. However, as approved pet premises need to have microbiological analysis carried out on their end products, we will take a number of samples from butchers to monitor the micro levels from this source. <p>This has to be an estimate as the detail has not yet been confirmed by the FSA. It will also depend upon Covid restrictions and when it is possible to recommence physical inspections in a safe manner.</p>
<p>3.7 Feed and Food Sampling</p>	<p>Sampling will be conducted where appropriate, as follows:</p> <ul style="list-style-type: none"> • As part of enforcement work at food premises to check compliance with food standards requirements. Particular emphasis will be given to compliance with the requirements of Food Information Regulations in relation to allergen information • In response to complaints, where required • As part of the FSA pilot • 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

	<ul style="list-style-type: none"> • Sampling work is conducted to determine compliance with feed and food standards and to monitor the effectiveness of manufacturing controls and associated quality systems • Formal samples will be taken in accordance with the procedures set out in the Food and Feed Enforcement codes of practice, where appropriate. • 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>3.8 Control and Investigation of Outbreaks and Food Related Infectious Disease</p>	<ul style="list-style-type: none"> • 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. • 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>3.9 Feed/Food Safety Incidents</p>	<ul style="list-style-type: none"> • Hampshire Trading Standards Service will act in accordance with the Food & Feed Enforcement Code of Practice and internal procedures to: <ul style="list-style-type: none"> • Identify and report feed and food hazards • Respond to Food and Feed Alerts issued by the FSA, where appropriate
<p>3.10 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.

	<ul style="list-style-type: none"> • 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.
3.11 Feed and Food Safety and Standards promotional work, and other non-official controls interventions	<ul style="list-style-type: none"> • 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 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 social media platforms that will be used to highlight topical issues regarding food related issues. • 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.

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 competent for feed and food enforcement as at April 2020.</p> <table border="1"> <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>TOTAL</td> <td>4.10</td> </tr> </tbody> </table>	Function	FTE	Management	0	Operational Field Officers (Food Standards)	3.0	Operational Field Officers (Feed)	1.0	Support Staff	0.10	TOTAL	4.10
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	<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 who undertakes food standards work has undertaken Basic Food Hygiene Training and several officers have undertaken ISO 9001 Lead Assessor training.
<p>4.3 Staff Development Plan</p>	<p>Training needs are identified by:</p> <ul style="list-style-type: none"> • Operational requirements arising from the Service Plan • 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. • 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 feed and food standards officer must also undertake 20 hours continuous professional development per year, at least 10 hours in the core subject, in order to maintain competency. • For officers conducting primary production inspections undertake training that is appropriate to the work that they do. <p>How these needs are met will vary, but sources of training include:</p> <ul style="list-style-type: none"> • Courses leading to an appropriate qualification • Refresher and updates, internal and external • E learning & self-learning • Coaching and job shadowing <p>Training must be approved by a manager before it is undertaken, and outcomes will be evaluated to ensure continued officer competence and value for money in terms of investment in learning.</p>

5. Quality Assessment

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5.1 Quality assessment and internal monitoring	<ul style="list-style-type: none"> • Internal monitoring will be conducted regularly both to assess the performance of Hampshire Trading Standards Service against the plan and the FSA Framework Standard and to make any necessary adjustments as the Covid 19 situation changes. • 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

6.1 Review against the Service Plan	<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"> • Number of businesses brought into compliance • Outcomes of projects and campaigns • Number of inspections undertaken against target • Response to feed and food complaints • Reactive work • Priorities and resource requirements are reviewed at the bi-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 will be subject to regular review at management and team meetings, both to monitor progress and assess whether any adjustments or amendments are necessary. • The end of year review includes an assessment against the previous year's plan as a means to measure improvement.
6.2 Identification of any Variation from the Service Plan	<ul style="list-style-type: none"> • 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.

Appendix I

1) HCC Food Samples

Description	Tested for	Number
Allergens – particularly free from claims	Accuracy of claim and compliance. As part of inspection programme or project, samples as appropriate	0-25
Butchers – as appropriate based on officer judgement	Accuracy of meat content Meat species identification in mince Allergens Additive levels	5-20
FSA samples – as directed as part of the pilot		
At point of entry – imported food where labelling may be amended prior to sale but composition cannot be changed	Additive levels	0-10 Dependent on what foods are imported

Appendix II

Feed samples

Description	Tested for	Number of samples
At point of entry – imported feed, as identified as appropriate	Heavy metals	Up to 5 Dependent on what imported feeds are identified
Venison for use in raw pet food	Presence of TB	Up to 6 samples
Samples from feed mills	Pesticides residue, mycotoxins or heavy metals	Up to 6 samples
Meat sold by butchers for pet food	Salmonella and micro analysis	Up to 5 samples