



Hampshire County Council

Trading Standards Service

Feed and Food Controls Service Plan

2022 – 2023

This Service Plan is issued under the authority of:

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Food Standards Agency Pilot

Hampshire Trading Standards is one of 12 local authorities that participated in the Food Standards Agency (FSA) pilot of the new risk rating scheme for food businesses. The pilot ran from January 2021 to March 2022. The new operating model represents a fundamental change in approach, so a full and robust evaluation is necessary in 2022-23 to assess its effectiveness before further national rollout which is anticipated to take place in 2023-24. 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 that participated in the pilot were not required to prepare a detailed service plan for their Food Standards work for the pilot period, as this aspect of work was included in a detailed FSA work plan.

Following on from the pilot, Hampshire Trading Standards will continue to use the new approach throughout 2022-23 until the evaluated outcomes are made available and the resulting new operating model is rolled out nationally.

Official Feed and Food Controls Service Plan

1. Service Aims and Objectives

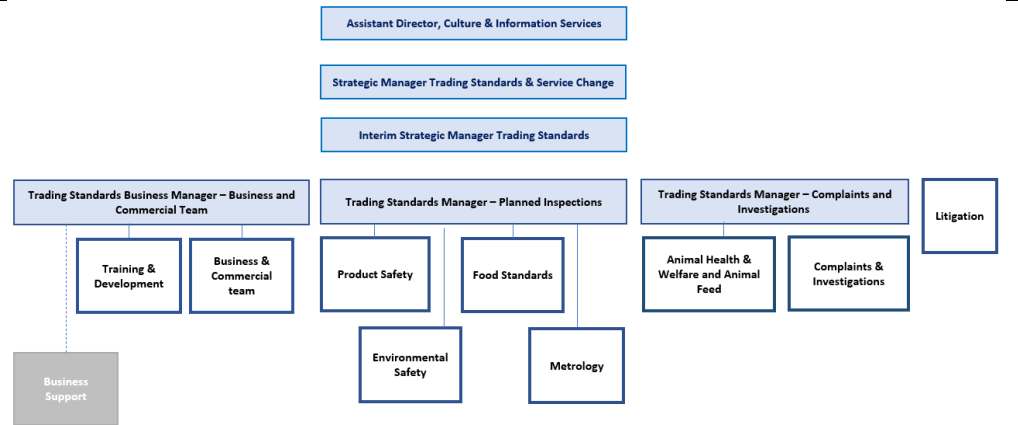
1.1 Aims and Objectives	<p>Aims:</p> <ul style="list-style-type: none">• To proactively protect consumers by ensuring a fair and safe marketplace that supports businesses to compete, thrive and prosper. <p>Objectives:</p> <ul style="list-style-type: none">• To support businesses with compliance with food standards and feed standards legislation.• To carry out an effective, intelligence led and risk-based programme of interventions including inspection, advice to businesses, sampling and analysis of food and animal feeding stuffs for composition, standards, and labelling.• To assess and, where appropriate, respond to complaints about the composition and quality of feed and foods.• To work in partnership with central government, other local government agencies and industry to provide a seamless service to customers.
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<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. • Supporting good public health through promoting 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 resilient 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.
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2. Background

<p>2.1 Profile of Local Authority</p>	<p>Hampshire is predominantly rural with Andover, Basingstoke, Winchester, Aldershot, Farnborough, Fareham and Eastleigh being the main urban areas.</p> <p>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, Adults’ Health and Care services, and Economy, Transport and Environment services. Within the Culture, Communities and Business Services department the Council delivers a range of services including Libraries, Registration, Country Parks, Scientific Services, Property Services and Trading Standards.</p> <p>Although 85% of the County is classified as rural, Hampshire County Council is responsible for regulating some 31,000 premises including over 9,000 food establishments and over 4,200 livestock premises.</p>
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2.2 Organisational Structure



The Trading Standards Leadership Team set the Enforcement Policy and Service priorities.

The Leadership Team, in conjunction with relevant officers formulate a Feed and Food Controls Service Plan to include inspection, intelligence-led projects and other actions.

Specialist officers in the Food, Animal Health and Animal Feed teams 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.

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

- **Food Standards Interventions** - Food standards interventions are carried out by staff assessed as being competent or staff supervised by such competent staff.
- **Feed Standards Interventions** - Feed standards interventions are carried out by specialist staff that are trained and competent in feed or by staff supervised by such competent staff.
- **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 the Citizens Advice Consumer Service (CACS) and, where appropriate, forwarded to Trading Standards.
- Complaints from business may also be received via several sources including 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 risk assessed and either assigned to an appropriate officer for appropriate action or recorded for intelligence purposes.

2.4 Contact details

Service	Address	Email / Telephone	Opening Hours
Trading Standards	Montgomery House Monarch Way Winchester SO22 5PW	tsadvice@hants.gov.uk Citizens Advice consumer helpline: 0808 223 1133	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

Food Premises Type	2019	2020	2021
Primary producer	381	175	181
Manufacturer/Packer	706	642	1463
Importer/Exporter	46	52	68
Distributor/Wholesaler	265	268	198
Supermarket/Hypermarket	353	349	360
Small retailer	1805	1808	2025
Retailers other	111	110	144
Restaurant	1442	1434	1591
Hotel/guest house	100	105	105
Pub/Club	1895	1855	1789
Take away	883	863	1011
Catering Establishment	27	29	32
School/College	509	507	507
Mobile Food Unit	316	319	507
Restaurant & caterers	159	158	182
TOTAL	8,998	8,674	10,163

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	2
R1-Manufacture &/or Place on Market Feed Additives	2
R4-Manufacture of Compound Feeding Stuffs	9
R5-Placing on Market of Compound Feeds	81
R6-Manufacture of Pet Foods	34

	R7-Manufacture &/or Place on Market Feed Materials	172
	R8-Transport of Feed & Feed Products	48
	R9-Storage of Feed & Feed Products	71
	R10-Mix Feed on Farm with Additives and Premixes	14
	R11-Mix Feeds on Farm with Comp Feeds Containing Additives	69
	R12-Food Business Selling Co Products as Feed Materials	30
	R13-Livestock Farm Not Mixing, or Mixing Without Additives	2317
	R14-Arable Farm Growing or Selling Crops for Feed	315
	TOTAL	3165
2.6 Regulation Policy	<p>A link to Hampshire Trading Standards enforcement policy is available at https://www.hants.gov.uk/business/tradingstandards/aboutus/enforcementpolicy</p> <p>The Enforcement Policy encompasses the requirements of the Regulators Compliance Code.</p> <p>Internal food procedures also incorporate a policy on potential conflicts of interest in respect of County Council premises.</p>	

3. Service Delivery

3.1 Interventions at Food and Feeding stuffs establishments	<p>Interventions at trade premises will have regard to published Food Standards Agency guidelines.</p> <p>Samples may, if necessary, be taken from premises outside the inspection programme.</p> <p>Due regard will be given to the amended FSA Code of Practice that was 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.</p>
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	<p>Intelligence-led inspections or other interventions will be conducted at those business sectors presenting the highest risk to the food chain and consumers/other legitimate businesses.</p> <p>It will also be appropriate, on occasion, to respond with inspections or other interventions where intelligence is received via consumer / trader complaints or referrals from other enforcement agencies about the non-compliance of individual businesses. In line with Hampton principles and the resources available the service will not therefore, as a matter of routine, carry out inspections at medium or low risk food businesses unless they are visited as a result of the aforementioned factors.</p> <p>The above measures are intended to focus our available resources on the areas of greatest risk, using available intelligence, and as such the service will not be able to fulfil a food inspection programme in accordance with the requirements of the Food Law Code of Practice (England).</p>
<p>3.2 Feed and Food Complaints</p>	<p>Feed and food complaints are investigated by Hampshire Trading Standards in line with documented procedures.</p> <p>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 which is by email, using published service contact information.</p>
<p>3.3 Home Authority Principle and Primary Authority Partnership Scheme</p>	<p>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> <p>Hampshire Trading Standards Service does not offer Home Authority arrangements; however, Primary Authority Partnerships are available to businesses where appropriate.</p>
<p>3.4 Providing advice to Business</p>	<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 • Where appropriate, advice and support may be given to new food businesses as a form of pre-emptive enforcement

	<ul style="list-style-type: none"> • 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>Intelligence-led projects will be identified by and undertaken in conjunction with Hampshire Scientific Service to assess the compliance of Hampshire-based businesses and gather intelligence of areas of non-compliance or consumer detriment. These may also continue to test the new risk rating scheme.</p> <p>The number of projects is determined by Hampshire Scientific Service and the number of samples and interventions will be determined by Trading Standards on a project-by-project basis. This approach will be piloted during 2022-23, so targets will be set to allow flexibility and will be reviewed and amended as appropriate during the year. See Appendix 1 detailing the proposed food samples.</p> <p>High risk visits During the 2022/23 business year the Service will review its premises records in relation to high-risk premises. The FSA food standards pilot highlighted 12 premises as being high risk. Assessment suggests that some of those are not considered to be high-risk and that other premises may be. The review, to be carried out by the Senior Trading Standards Officer leading the food team, will seek to identify those premises which are genuinely high-risk with a view to prioritising those premises for inspection and/or other appropriate intervention to support their compliance with food regulation. This project will support the appropriate deployment of our limited resources to where they can have the greatest impact.</p> <p>Information to businesses regarding the changes to labelling requirements from October 2021 for foods pre-packed for direct sale (PPDS): A project was undertaken in March 2022 to test compliance with this legislation and its findings will be reviewed in April 2022, to determine appropriate follow up action where it may be necessary. This will also continue to be addressed by information put out as part of Trading Standards' communications plan.</p> <p>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	Feed inspection work is funded by the Food Standards Agency. Annually a desktop planning exercise is undertaken to establish the

	<p>premises due for inspection for the financial year and funds are allocated based upon this.</p> <p>Based on 2022-23 funding, targets for the financial year will be approx:</p> <ul style="list-style-type: none"> • Inland feed visits – 42 • Primary production farm visits – 19 • RTE high risk primary production visits (delivered in partnership with District Councils) – 6 • Feed mills – 1 <p>Targets will be reviewed during the year and if the plan is achieved ahead of schedule further funding will be requested from the FSA to deliver additional inspections.</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. Emphasis will be given to compliance with the requirements of Food Information Regulations in relation to allergen information. • In response to complaints, where required and in line with assessed risk, service priorities and wider intelligence. • 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. • 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</p>	<p>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.</p>

Infectious Disease	All food specialist staff are authorised by the Minister under the Food and Environment Protection Act to deal with any food related environmental problems.
3.9 Feed/Food Safety Incidents	<p>Hampshire Trading Standards Service will act in accordance with the Food & Feed Enforcement Code of Practice and internal procedures to:</p> <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.
3.10 Liaison with Other Organisations	<p>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.</p> <p>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.</p> <p>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.</p> <p>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>
3.11 Feed and Food Safety and Standards promotional work, and other non-official controls interventions	<p>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.</p> <p>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 food and feed issues.</p> <p>Hampshire Trading Standards Service website contains information for businesses and consumers on feed and food related topics. including links to other relevant websites.</p>

4. Resources

4.1 Financial Allocation	Hampshire Trading Standards Service Leadership Team is responsible for the allocation and delegation of budgets allocated to the feed and food enforcement functions. Delegated budgets are managed by the relevant Senior Trading Standards Officers.												
4.2 Staffing Allocation	<p>The table below summarises the staffing levels available, qualified and competent for feed and food enforcement as at April 2022.</p> <table border="1" data-bbox="483 584 1425 851"> <thead> <tr> <th>Function</th> <th>FTE</th> </tr> </thead> <tbody> <tr> <td>Management</td> <td>0.2</td> </tr> <tr> <td>Operational Field Officers (Food Standards)</td> <td>2.6</td> </tr> <tr> <td>Operational Field Officers (Feed)</td> <td>1.2</td> </tr> <tr> <td>Support Staff</td> <td>0.10</td> </tr> <tr> <td>TOTAL</td> <td>4.1</td> </tr> </tbody> </table> <p>Each Trading Standards Officer working on feed and food enforcement is appropriately qualified and competent in accordance with the Food Enforcement Code of Practice.</p> <p>Acceptable qualifications include Diploma in Consumer Affairs and Trading Standards (DCATS), Diploma in Trading Standards (DTS) or Diploma in Consumer Affairs (DCA).</p>	Function	FTE	Management	0.2	Operational Field Officers (Food Standards)	2.6	Operational Field Officers (Feed)	1.2	Support Staff	0.10	TOTAL	4.1
Function	FTE												
Management	0.2												
Operational Field Officers (Food Standards)	2.6												
Operational Field Officers (Feed)	1.2												
Support Staff	0.10												
TOTAL	4.1												
4.3 Staff Development Plan	<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, to maintain competency. • 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. 												

	<ul style="list-style-type: none"> • 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> <p>For this business year, training and development is focussed on demonstrating competence for officers new to this area of work as well as raising the competence level of those already operating in this field.</p>
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5. Quality Assessment

<p>5.1 Quality assessment and internal monitoring</p>	<p>Internal monitoring will be conducted regularly both to assess the performance of Hampshire Trading Standards Service against the plan and the FSA Framework Standard.</p> <p>Hampshire Scientific Service is UKAS accredited to the EN ISO/ IEC 17025 standard and participates in external proficiency schemes, for example, FAPAS.</p>
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6. Review

<p>6.1 Review against the Service Plan</p>	<p>Hampshire Trading Standards Service has adopted the National Trading Standards (NTS) Intelligence Operating Model (IOM) approach to the prioritisation and allocation of work.</p> <p>The Feed and Food Controls Service Plan is set against the Hampshire Trading Standards Service priorities and performance indicators will include:</p> <ul style="list-style-type: none"> • Completion of intelligence-led projects in conjunction with Hampshire Scientific Service. • Completion of actions arising from intelligence-led projects in order to support business compliance. • Number of businesses brought into compliance. • Outcomes of projects and campaigns. • Number of high-risk inspections undertaken against target. <p>Priorities and resource requirements are reviewed at the monthly Hampshire Trading Standards Service Tactical Tasking and Co-ordination Group (TTCG) meetings and at monthly management team meetings. At these meetings decisions are made regarding the deployment of resources, including those needed for formal investigations.</p> <p>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</p>
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	<p>necessary. Quarterly performance monitoring is undertaken across the service.</p> <p>The end of year review includes an assessment against the previous year's plan to measure improvement.</p>
<p>6.2 Identification of any Variation from the Service Plan</p>	<p>Any variance in the plan will be examined. These variances will be documented and where additional unplanned work has met the desired objective this will be recorded.</p>

Appendix I

HCC Food Samples

Sample numbers will be determined on a project-by-project basis in-year.

Description	Tested for	Number
Seeds, including quinoa, prepacked or non-prepacked	To analyse seed samples for aflatoxin B1 and total aflatoxin and assess against regulatory limits	To be determined
Pre-packed honey with a particular focus on imported honey such as Manuka	To measure the levels of HMF in honey to check compliance against the maximum stated in the Honey (England) Regulations 2015	To be determined
Sausages and burgers – pre-packed and non-pre-packed	To quantify the meat content of these products and compare against claims made and minimum meat contents as prescribed in the Products Containing Meat etc (England) Regulation 2014.	To be determined
High protein foods	To determine the protein content against any high protein claims.	To be determined
Plant based milk alternative takeaway drink	To check for the presence of milk either as a result of cross contamination or preparation error.	To be determined
Wide range of foods associated with potential Ochratoxin contamination	Assess the level of ochratoxin A in products which do not have a maximum permitted level stipulated in Regulation (EC) No 1881/2006.	To be determined

Appendix II

Feed samples

Description	Tested for	Number of samples
Pilot sample of poultry feed manufacturers - Intelligence gathering exercise to check compliance with labelling declarations.	Lysine and methionine	2 samples