NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Regeneration and Sustainable Development Cabinet Board 26th October 2018

Report of the Head of Planning and Public Protection N. Pearce

Matter for Information

Wards Affected: All Wards

Report Title

ENVIRONMENTAL HEALTH AND TRADING STANDARDS: FOOD AND FEED SERVICE DELIVERY PLAN 2018-2019 and the FOOD AND FEED LAW ENFORCEMENT REVIEW 2017-2018

Purpose of Report

1. To inform Members of the work plan for 2018-2019 of the Authority's Food and Feed enforcement service and the review of the Food and Feed enforcement service for 2017-2018.

Executive Summary

- 2. Food hygiene, and Food & Feed standards enforcement remains a priority for the service.
- 3. Food hygiene inspection resources were prioritised and continue to be prioritised on undertaking appropriate interventions at all high risk food premises. An initiative to address the backlog of lower risk premises was successfully achieved in conjunction with some resource assistance from the Food Standards Agency- Wales. The national performance indicator which identifies 'broadly compliant' premises remains consistently high. National and local food sampling initiatives were carried out throughout the year, and we will continue to take part and make use of sampling resources made available. The service utilises Social Media opportunities to

raise awareness of current issues. Charges have been introduced for the provision of bespoke Business advice and consultancy, whilst a basic level of advice and signposting remains free of charge.

- 4. Feed/Feeding stuffs Standards work continues to be delivered regionally, in conjunction with City & County of Swansea Council (as funded directly by the Food Standards Agency). The crossborder arrangements appear to be a continuing success.
- Food Standards interventions are overdue at some premises, this backlog illustrates that the allocated resource for food standards delivery is insufficient and is unlikely to change due to the FFP requirements imposed on the service.
- 6. The department is trialling a new approach at some premises following the systems review of the service utilising officers of the food hygiene team to assist with combined inspections at certain premises.

Background

- 7. The Food Safety Act 1990 and the Food Standards Act 1999, together with associated statutory guidance, require local authorities to make provision for the enforcement of food and animal feeding stuff safety measures and to plan for service delivery on an annual basis. The proposed Service Delivery Plan, attached as Appendix 1, sets out the way in which the Environmental Health and Trading Standards Service intends to deliver food and feed law enforcement during the period 2018-2019.
- 8. It sets the scene for the enforcement function locally, whilst recognising national priorities. It sets the hierarchy of priorities for which the service is responsible, and indicates the range of interventions which are designed to maximise the health gain and public protection from the resources available.

- 9. The aims and objectives of the food and feed law enforcement service are:
 - To help to maintain a safe and healthy environment in the County Borough
 - To ensure food and feed produced or consumed within the area does not present a risk to health and to take action to prevent it entering or limiting its introduction to the food chain.
 - To ensure the effective control of feed destined for consumption by animals entering the food chain and pet animals.
 - To encourage good practices in food safety, food & feed standards and fair-trading, and to take action to discourage practices which are unfair to other traders or threaten health.
 - To enforce the relevant environmental health and trading standards legislation via a variety of interventions at premises in the County Borough, e.g. sampling, intelligence led investigations and surveys, and investigation of complaints, malpractices and cases of food poisoning.
 - To ensure that resources are targeted where they are most effective and address areas of highest public health risk.
 - To respond to requests for advice and to seek to raise awareness of food safety and food & feed standards issues.
 - To help business owners to comply with their obligations under food & feed legislation and to take appropriate action as per the enforcement policy against those who will not.
- 10. The authority must carry out an annual food and feed law enforcement performance review as part of the Framework Agreement (2010) between the Local Authority and the Food Standards Agency, which is attached at Appendix 2.
- 11. The framework agreement sets out the planning and delivery requirements of feed and food official controls, based on the existing statutory Codes of Practice.

12. The performance review considers the various requirements of "The Standard", which include planned inspections / interventions, sampling, service requests and complaints, promotional work, training of staff and monitoring arrangements.

Financial Impact

13. None

Equality Impact Assessment

14. A Screening Assessment has been undertaken to assist the Council in discharging its Public Sector Equality Duty under the Equality Act 2010. After completing the assessment it has been determined that this proposal does not require an Equalities Impact Assessment.

Workforce Impact

15. No impact on current workforce

Legal Impact

16. None

Risk Management

17. None

Any Other Impacts

18. None

Consultation

19. There is no requirement under the Constitution for external consultation on this item

Recommendation(s)

20. The Food & Feed Service Delivery Plan 2018- 2019 and the Food & Feed law enforcement review 2017-2018 are for information.

Reason for Proposed Decision(s)

21. To inform members of the work plan for the Food & Feed enforcement service for 2018-2019 and of the Food & Feed law enforcement review 2017-2018.

Implementation of Decision

22. The decision is proposed for implementation after the three day call in period.

Appendices:-

23. Appendix 1 - Food and Feed Service Delivery Plan 2018-2019
Appendix 2 - The Food and Feed Law Enforcement review 2017–2018.

List of Background Papers

24. None

Officer Contact

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NEATH PORT TALBOT COUNTY BOROUGH COUNCIL CYNGOR BWRDEISTREF SIROL CASTELL-NEDD PORT TALBOT

FOOD & FEED LAW ENFORCEMENT SERVICE DELIVERY PLAN 2018-2019



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Neath Port Talbot Office Hours:

8.30am to 5.00pm Monday to Thursday

and 8.30am to 4.30 pm Friday.

Outside of normal office hours

Emergency food safety issues are currently directed initially to a 24 hour emergency call out service and the officer on-call has access to senior food officers in an emergency.

To meet the demands of a 24 hour economy the department regularly carries out enforcement work outside of normal office hours, including evening and weekends. Officers are expected to carry out this work as part of their normal duties.

Correspondence address:

Environmental Health & Trading Standards is Civic Centre, The Quays, Brunel Way, Baglan. SA11 2GG.

Telephone contact:

01639-686868 / 685678. Consumer complaints for Trading Standards are automatically transferred to Citizens Advice Consumer Service.

Website:

www.npt.gov.uk

The website has information on EH&TS services for consumers and business and links to other information.

E-mail & Social media

Environmental Health: ehd@npt.gov.uk Trading Standards: tsd@npt.gov.uk

Facebook NptEnvHealth/TradingStandards

Twitter (NPTEHTS) and other Social Media.

1.0 SERVICE AIMS AND OBJECTIVES

1.1 Purpose of the Service

It is the policy of Neath Port Talbot County Borough Council to strive to ensure food safety from the farm or primary producer (via enforcement of animal feed hygiene & standards and animal welfare) through to the ultimate consumer via retail, manufacturer and catering establishments (the 'farm to the fork' principle).

As part of its national Food Safety framework agreement, the Food Standards Agency (FSA), requires all local authorities to prepare a service delivery plan which reviews the implementation of the previous plan and details the delivery of their food safety enforcement responsibilities for the following year.

The plan seeks to ensure that national priorities and standards are delivered locally and provides a balanced approach to local food safety enforcement. This is achieved by not merely directing resources towards the programmed inspection process, but also by ensuring that adequate provision is made to address food & feed complaints, food poisoning notifications and other reactive work, advice to businesses, and also the ability to follow-up on intelligence driven areas of work such as sampling, food fraud and targeted inspections.

1.2 Aims and Objectives

The aims and objectives of the food and feed law enforcement service are:

- To help to maintain a safe and healthy environment in the County Borough
- To encourage good practices in food safety, food & feed standards and fair-trading, and to take action in line with the enforcement policy to discourage practices which are unfair to other traders or threaten health (via inspections, sampling, intelligence led investigations and surveys, investigation of complaints, malpractices and cases of food poisoning and advising feed and food business operators)
- To ensure that resources are targeted where they are most effective and address areas of highest public health risk

1.3 Link to corporate objectives and plans

In delivering the food and feed law enforcement service, both Food and Health Protection, and Trading Standards will continue to promote the corporate aims and objectives of the authority and sustain the reputation of the council. In particular the service will be delivered in a manner that is sensitive to service users and citizens' individual expectations. The emphasis will be on protecting and improving health, and promoting the economy of the County Borough. There are Local and National Performance Indicators for these services (see Paragraph 3.1.4 below). These are monitored on a quarterly basis via the corporate performance management framework.

2.0 BACKGROUND

2.1 Profile of Neath Port Talbot

Neath Port Talbot County Borough Council is a Unitary Authority, situated in South Wales and is a recognised statutory Food Authority. The towns of Neath, Port Talbot and Pontardawe are the largest settlements in the Borough. A number of other villages and settlements are dispersed throughout the remaining rural valley areas of the County Borough. The County Borough serves a population of approximately 139,800 (Census, 2011) and covers an area of 44,217 hectares. It is the seventh largest authority in terms of population in Wales. There are approximately 1700 food/feed premises within the County Borough (being circa 1374 food premises and circa 326 feed premises) in which food or drink and feed or drink is produced, manufactured, processed, stored or sold. (See section 2.4 for further details on premises profile).

2.2 Organisational Structure

The charts attached as appendices A, B and C illustrate the organisational structures of the Sections.

The functions of Environmental Health and Trading Standards are the responsibility of the Head of Planning & Public Protection service in the Directorate of Environment.

The day to day service delivery of the Food & Feed Services are overseen by the Team Leader- Food & Health Protection, and the Team Leader- Trading Standards respectively.

External services are provided to the section by:

Public Health Wales (formerly the Public Health Laboratory Service, PHLS) at West Wales General Hospital, Carmarthen— for food examination (Microbiological).

Public Analysts (Minton, Treharne & Davies Ltd and Public Analyst Scientific Services Limited) – for food & feed analysis (Non-microbiological).

Occasional use of contracted workers (contractors / locum officers) to cover maternity and other staffing shortfalls, or emergencies.

Food Standards Agency - for guidance and partnership working opportunities.

Citizens Advice Consumer Service - referrals of food and feed complaints.

2.3 Scope of the Food & Feed Law Enforcement Service

The Food Hygiene service is delivered by officers of the Food Safety Section. The Food Standards and Feed functions are delivered by officers of the Trading Standards section.

The services also have responsibility for the following functions:

Fair Trading	Consumer Frauds	Investigation and control of communicable diseases
Health Promotion;	Weights & Measures	Animal Welfare
Product Safety	Petroleum Approval Enforcement	Underage Sales

These services are delivered via:

Inspection programmes	Provision of advice to businesses	Sampling programmes
Criminal investigation	Responding to national food / feed alerts and recalls	Inspection of weighing & measuring equipment

When necessary, suitably competent and qualified food hygiene and food standards contractors are used to cover long term sickness/maternity leave/vacant posts or project work funded by external sources, but all in accordance with service need, the resources available and with authorisation by the Head of Planning and Public Protection.

2.4 Demands on the Food & Feed Service (Food Hygiene; Food Standards; Feed Standards)

Premises Profile:

Table 1(a): Total number of Food & Feed premises within the Authority					
Food premises	Feed Premises				
1374	326				
(of which 1309 are Registered within NPT).					

see Appendix D for numbers of premises by Ward area

Table 1(b):	Types of Food premises: 2016- onwards.						
CODE	FOOD PREMISES	NO. OF PREMISES (2016/17)	NO. OF PREMISES (2017/18)	NO. OF PREMISES (2018/19)			
F01	Primary Producer	1	1	2			
F02	Manufacturer / Packer	24	23	26			
F03	Importers / Exporters (EU)	0	0	0			
F04	Distributor / Transporter	15	15	10			
F05	Supermarket / Hypermarket	42	23	24			

F06	Small Retailer	243	232	203
F07	Retailer / Other	53	71	92
F08	Restaurant / Café / Canteen	192	189	198
F09	Hotel / Guest House	18	22	12
F10	Pub / Club	203	209	191
F11	Takeaway	147	145	140
F12	Caring Premises	211	217	207
F13	School / College	95	96	79
F14	Mobile Food Unit	55	52	53
F15	Restaurants & Caterers - Other	132	123	135
F16	Importers / Exporters (3 rd Countries)	2	2	2
TOTAL		1433	1420	1374

 Food advice is available, in a variety of languages, to businesses via the Food Standards Agency's initiative "Safer Food, Better Business" (SFBB).

Table 1(c):	Types of Feed premises: 2016- onwards					
Code	Animal Feed Premises	No. of PREMISES (2016/17)	No. of PREMISES (2017/18)	No. of PREMISES (2018/19)		
А	Manufacturer Using / containing additives	2	2	2		
В	Manufacturer Not Using Additives	3	3	3		
D	On Farm Mixer Using Additives	1	1	1		
E	Store - In Region Distribution	3	4	3		
	Importer - Out Of Region Distribution	1	2	1		
J	Surplus Food Supplier	12	8	12		
Р	Co Product Producer - In Region	2	0	2		
S	Livestock Farm	275	210	283		
T	Arable farm	17	10	17		
U	Any Other Business	1	0	1		
Х	Not Known	1	1	1		
Total:		321	241	326		

Increased feed work has meant that the department's feed premises records are becoming more accurate.

The county borough has 3 specialist feed manufacturers requiring inspection by officers with specific qualifications and competencies.

In line with the Food Law Code of Practice, the authority has placed an emphasis on "interventions" at food & feed businesses rather than full inspections. Full inspections / audits

are targeted on the highest risk businesses, or following intelligence received by the department. This is explored further in Paragraph 3.0.

Lower risk food and feed businesses will not necessarily be subject to a full programmed inspection, but may be dealt with via a focussed survey or as part of the food sampling programme.

The authority's food and feed enforcement activity is recorded on the Authority APP system. The annual returns and enforcement data that are to be submitted to the Food Standards Agency are exported from this system via the Local Authority Enforcement Monitoring System (LAEMS).

2.5 Systems Review and Additional Demands

During 2017/18, the Food & Health Protection Service (food hygiene) and the Trading Standards Service underwent a review of their services in a bid to identify waste, duplication and increase the efficiency of both services. This review identified areas of "crossover" between food standards and food hygiene, including the need to improve the coordination of food law enforcement between the services, with a view to minimising duplication and improving the sharing of information and intelligence.

In addition, it was identified that "back office and administrative" work was hindering officers from delivering the service to food businesses. Consequently, the two services are piloting "agile" working within the authority. The principle being that officers should be able to carry out enforcement work with as few distractions as possible and a reduction of ties to the office. This means most officers will no longer have a fixed desk, be more dependent on mobile IT devices and have the ability to work efficiently off site.

In addition to the normal workloads, it is anticipated that further demands will be made on the service in 2018/19 as a consequence of the following:

- The implementation of the requirements of the General Data Protection Regulations
- The continuing impact (long term) on food safety of the Pennington Report following the public inquiry (2009) into the (fatal) South Wales E. coli outbreak (2005) and recommendations for enforcement.
- Sustaining collaboration on the implementation of the Mandatory Food
 Hygiene Rating Scheme and Food Hygiene Rating (Wales) Regulations 2013
 and to provide open feedback on the compliance levels achieved by individual
 businesses.
- Continued promotion of the requirement for relevant Businesses to be operating to a documented Food Safety Management System, which is commensurate with their activities.
- The continued repercussions of the new Consumer Rights Act and The Powers of Entry Code of Practice, redefining how Trading Standards, operate and use their statutory powers.
- The continued development of a Trading Standards' intelligence led approach. Implementing the Intelligence Operating Model and deploying

resources accordingly, identifying the areas of greatest need.

- Further development of cross boundary and regional work in the fields of food and feed, to ensure that resilience is built into service delivery.
- The development of the Primary Authority Scheme within NPT.
- The implementation of charging for the provision of business advice.
- The implications of the UKs exit from the European Union and its effect upon enforcement and the economy.
- Identifying food businesses supplying "co-products" (i.e. former foodstuffs reprocessed as animal feed) and advising them of their obligations and responsibilities.
- Tackling the areas identified as local and national priorities for food & feed standards, including food allergens, food supplements (commonly sold over the internet) and adulteration and substitution of food.
- The maintenance of the regional feed enforcement delivery model with Swansea Trading Standards as per the agreement with the Food Standards Agency.
- Continue to risk assess the unrated feed & food businesses within the county borough.
- Accommodating service delivery in line with the Business Plan relevant to the service, in addition to NPT's Forward Financial Plan (FFP).
- To continue to monitor for the presence of illicit and /or counterfeit foodstuffs that have been detected in other authorities, utilising and analysing intelligence received from the Regional Intelligence Analyst, Food Fraud Unit, local intelligence sources and partners.
- An increase in infectious disease cases and isolates, following the implementation of new DNA/Molecular Testing.

2.6 Regulation Policy

The department has a Member Approved enforcement policy incorporating the concepts of the Enforcement Concordat, Regulatory Enforcement and Sanctions Act 2008, Primary Authority Scheme and the relevant food and feed law codes of practice.

The enforcement policy can be found on the Council website:

https://www.npt.gov.uk/14112

Officers of the service will seek to ensure operators of food & feed businesses comply with relevant food & feed legislation by means of:

- providing information and advice,
- raising awareness of the law and good practice associated with the legislation,
- providing education and training,
- taking enforcement action where necessary and in line with the enforcement policy

3.0 SERVICE DELIVERY

3.1 Interventions at Food and Feeding stuffs establishments

3.1.1 Intervention Policy

The authority will continue to implement a planned programme for food hygiene and food standards interventions and feed inspections at premises within the County Borough.

The Food Law Code of Practice (Wales) has introduced a range of possible interventions to allows officers to use their professional judgment to apply a proportionate level of regulatory and enforcement activities to each food business.

Interventions are split into 2 categories

- 1. Official controls include:- inspections; monitoring; surveillance; verification; audit; and sampling (where the analysis is to be carried out by an official laboratory).
- 2. Other interventions which do not constitute official controls include:education, advice & coaching provided at a food establishment; and information & intelligence gathering.

Interventions are applied in a risk-based manner such that more intensive regulation is directed at those food businesses that present the greatest risk to public health.

3.1.2 Systems review and the coordinated intervention programme

Following the internal review of the food safety service, interventions will be assisted by a coordinated food hygiene and food standards inspection programme. Most lower risk food standards premises (category "C" rated and selected "B" rated or businesses that have been identified as being lower risk) will be inspected for that element by suitably trained food hygiene officers during their programmed inspections.

Similarly, low risk food hygiene businesses (category "E" rated) will be subject to an unofficial control from food standards officers. In both cases, more complex matters detected during the inspection will be referred back to the relevant team. The food hygiene team have taken on the duty of carrying out food standards interventions focusing on specific issues at designated "C" rated or likely to be "C" rated food businesses.

Food Hygiene

The intervention programme is based on the intervention rating scheme contained in Annex 5 of the Food Law Code of Practice, which means that, dependent on risk, premises should be inspected or subject to a suitable intervention within a range of 6 months to 3 years.

Food Hygiene Interventions will be undertaken in accordance with the guiding themes contained within the Food Hygiene Interventions Procedure, the relevant legislation, Food Law Code of Practice and Practice Guidance and the Industry Guides. Officers will carry out food hygiene interventions to ensure that food meets the requirements of food hygiene and safety law, including microbiological quality, absence of pathogenic micro-organisms, and safety for consumption.

During interventions, competent officers will place particular emphasis on assessing and advising food businesses on the requirement for a documented food safety management system and food hygiene training.

Following a systems review, the section has been redesigned into reactive and proactive teams. Resources can flow between the two teams as required.

Table 2(a): Planned Food Hygiene Interventions due 2018/19 (as at 1st April 2018)

RISK CATEGORY	NUMBER OF PREMISES CARRIED FORWARD	(NUMBER OF PREMISES IN CATEGORY 2018/19)	NUMBER OF NEW INTERVENTIONS DUE / PLANNED 2018/19	TOTAL NUMBER DUE / PLANNED 2018/19	ESTIMATE NUMBER DUE / PLANNED 2019/20
		Н	IGH RISK		
(2 interventions per year)	0	(6)	12	12	e.10
B (1 intervention per year)	0	(53)	53	53	e.60
C (1 intervention every 18 months)	0	(483)	308	308	e.320
Unrated initially until formally inspected (prior to opening / within 28 days of opening).	94			94	
Sub Total				467	e.390
ESTIMATE: New Businesses				Circa e.120 – 150	Circa e.120-150
ESTIMATE: No of premises				Circa	Circa

likely to Cease Trading				e.120 – 150	e.120-150
		L	OW RISK		
D	0	(138)	75	[75]*	e.70
(1 intervention every 2 years)					
E (premises should be inspected every 3 years or can be subject to an Alternative Enforcement intervention in lieu of inspection)	0	(563)	97	[97]*	e.190

Certain low risk premises may at the discretion of the authority be subject to an alternative enforcement regime.

As per the Code of Practice:

Category D premises should receive an intervention every 2 years. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control.

Category E premises should be subject to an intervention every 3 years, which could be part of an Alternative Enforcement Strategy.

*Priority for interventions will always lie with Higher Risk categories, consequently, lower risk (category D & E) may be de-prioritised, where resources are capped.

In addition to the planned interventions above, any 'newly opened / change of ownership' food premises will be targeted for inspection / an intervention. In 2017/18, there were 229 requests for advice in relation to food premises registration and new food businesses, and a similar figure is estimated for 2018/19.

It is estimated that in addition to the planned primary inspections/interventions to be undertaken, a further 200 food hygiene "revisits" will also be carried out. This detailed involvement with Food Business Operators and their staff is an ideal opportunity to progress Best Practice standards and promote health and well-being in the wider context, as well as ensuring improvements are made.

Premises eligible for a rating under the Mandatory Food Hygiene Rating Scheme have their scores publicised on the following website: www.food.gov/ratings.

Businesses who initially fail to meet the highest standard (Food Hygiene Rating of 5), but who subsequently implement improvements are entitled to apply for a reassessment visit. This has caused an increase in demand for resources to undertake these re-inspections, but due to the importance of implementing the scheme and the need to support businesses going forward, we will prioritise this work area. An all-Wales fee is set for this work.

Food Standards & Feed Standards

The inspection / intervention programmes are based on the inspection rating scheme contained in Annex 5 of the Food Law Code of Practice and the Feed Law Code of Practice.

Therefore, dependent on risk, all premises will be scheduled for an inspection or intervention within a range of 12 months to 5 years.

Certain low risk Food Standards premises may, at the discretion of the authority, be inspected via an alternative enforcement regime or during a food hygiene visit as set out in 3.1.2

Officers undertaking food and feed standards inspections will ensure that the food or feed business is meeting the legal requirements relating to quality, description, composition, labelling, presentation and advertising of food, and of materials or articles in contact with food and feed.

The Feed Standards & Feed Hygiene inspection programme is set and funded by the Food Standards Agency and delivered regionally coordinated by and in conjunction with Swansea Trading Standards.

Animal health officers have the responsibility of inspecting feed hygiene systems on farms.

During inspections / interventions competent officers will carry out statutory duties in line with the legislation and local policy.

Table 2(b):	Planned Food Standards Interventions due 2018/19						
	and es <i>timated for 2019/20</i>						
CATEGORY	(TOTAL NO. OF PREMISES IN CATEGORY 2018/19)	NO. OF PREMISES CARRIED FORWARD (BACKLOG- DUE PRIOR TO 31//3/18).	NO. OF NEW INTERVENTIONS DUE 2018/19 (1/4/18-31/3/19)	CUMULATIVE TOTAL NUMBER PLANNED BY 31/3/2019 (INCLUDING BACKLOGS)	ESTIMATED NUMBER OF REVISITS 2018/19	ESTIMATED NUMBER DUE / PLANNED 2019/20	
(1 intervention a year)	(13)	0	13	13	5	12	
(1 intervention every 2 years)	(293)	13	116	129	12	150	
(1 intervention every 5 years / AES)	(737)	204	88	292	5	200	
UNRATED	(396)	396	-	396	10	0	

In accordance with the Framework Agreement and frequencies set in the Food & Feed Law Code of Practice :

⁻Food Standards Category B premises should receive an intervention every 2 years. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control.

-Food Standards Category C premises should be subject to an intervention every 5 years, which could be part of an Alternative Enforcement Strategy. Where resources are capped, the priority will remain with category "A" businesses and unrated businesses

Table 2(c):

Planned Feed Standards Interventions due 2018/19

and estimated for 2019/20

Feed is now co-ordinated on a regional basis, inspections numbers are dictated by the level of funding and direction from the Food Standards

Agency

Premises Type	NPT planned 2018/19	NPT Estimated 2019/20
Manufacturer	1	2
Co Product Producer	4	6
Mobile Mixer	0	0
Importers	0	0
Feed Stores	1	1
Distributor	2	2
Transporter	1	1
On Farm Mixer (Annex II)	1	2
On Farm Mix	0	0
Pet Food Manufacturer	1	1
Supplier of feed materials/Surplus Food	0	0
Sub Total	11	15

"Above The Line"		
Livestock farms	35	40
Total due for inspection	46	55

3.1.3 Resources For Inspections / Interventions

Staff resources

Food Hygiene

The following table contains the current staffing structure breakdown

Table 3(a) – as at 1/4/2018 (expressed as FTE's- Full Time Equivalents)

	EHORB (EHO)	EHORB (Higher Risk premises)	Non-EHORB (Support Staff)	Total
Team Leader (F&HP)	1.0			
Senior EHO (F&HP)	0.92			
EHO (F&HP)	4.13 (was 5.13)			
Enforcement Officer		2.86		
Support Officer			1.0	
Total as at 2018-04-01	6.05	2.86	1.0	9.91
*Note: 1.0 fte EHO (F&HP) is currently seconded				
Historic Totals (trends):				
Total as at 2017-04-01	6.84	1.86	1.33	10.03
	(+0.22		approx.	(+ 0.22 temporary

	temporary)		(NB- 1 officer pursuing qualification)	= 10.25)
Total as at 2016-04-01	6.84	1.86	1.33 approx.	10.03
Total as at 2015-04-01	5.2	1.0	3.9	10.1
Total as at 2014-04-01	5.1	1.0	3.0	9.1

Food Hygiene: All EHO's currently in post have either the B.Sc. (Hons) degree, M.Sc. or Diploma in Environmental Health and are approved by EHRB (Environmental Health Registration Board). All Enforcement Officers hold the Higher Certificate in Food Premises Inspection, or equivalent. The Table above illustrates the FTE number of staff working on food hygiene law enforcement (food hygiene and associated matters) including support staff and their relevant competencies as per the Code of Practice.

In 2017, additional funding (approx. 0.88 FTE) was secured to strengthen the food hygiene team- being 0.22 FTE qualified inspectors resource, and 0.66 FTE support officer resource. Temporary staff and locums/contractors have also been utilised in previous years to support the service, when additional resources have been needed.

There is the facility to redeploy Food Hygiene qualified staff to or from other parts of the service when necessary (see Chapter 4 on Resources for fuller details on the current staffing structure).

Staffing Allocation (Apportionment estimates: Required & Allocated)

Table 3(b):

Food Hygiene Resources				
	Estimate of Required Resources	Allocated	Relative priority assigned	
Food hygiene inspections: Cat A-C	3.8	3.8	High / Medium- high	
Food hygiene inspections: Cat D	0.6	0.5	Medium-low	
Food hygiene inspections: Cat E	0.4	0.2	Low	
Food hygiene Complaints	1.2	1.2	High / Medium- high	
Food hygiene Sampling	0.2	0.2	Medium	
FH New Businesses & Compulsory Registrations	0.5	0.5	Medium-high	
FH Advice & Promotional work	0.3	0.3	Medium / Medium- low	
FH Revisits	0.6	0.6	Medium-high	
FH Rating Scheme Re- Rating visits	0.2	0.2	High	
FH Rating Scheme enforcement	0.1	0.0	Resources diverted when required.	
FH Prosecutions	0.1	0.0	Resources diverted when required.	
Food Fraud investigations and	0.1	0.0	Resources diverted when	

surveillance			required.
Food hygiene Unrated inspections & work carried forward.	0.1	0.1	Medium
Food Related Infectious Disease control, inc food poisoning cases & outbreaks	1.0	1.0	High
Food hygiene Approved Premises	0.1	0.1	High
FH Import & Export; & Novel foods	None at present	0.0	Resources diverted when required.
FH Service Improvement (Monitoring, Planning, Reviews, Policies, Consultations)	0.8	0.7	High / Medium- high
Food hygiene safety alerts	0.1	0.1	Medium
Other Food hygiene work	0.2	0.2	Resources diverted when required.
Non-hypothecated / generic enforcement resource		0.21	
TOTALS (in FTE's):	10.4	9.91	

It is estimated that the required resource to deliver all aspects of the Framework Agreement and Code of Practice is 10.4 FTE.

Food Standards and Feeding stuffs

<u>Table 4(a):</u>

Trading Standards Food & Feed Staffing at 1/4/2018						
Food Standards	DTS	DCA	DCATS Qualified	(Unqualified)	Total	
TS Team Leader	0.3				0.3	
TSO	1.0				1.0	
Enforcement Officer		0.5	1.0		1.5	
TS Assistant				0.1	0.1	
Admin				0.1	0.1	
Total as at 1.4.2018	1.3	0.5	1.0	0.2	3.0	
Total as at 1.4.2017	1.2	0.4	0.4	0.2	2.2	
Total as at 1.4.2016	1.2	0.4	0.4	0.2	2.2	
Total as at 1.4.2015	1.5	0.3	0.3	0.8	2.9	
Total as at 1.4.2014	1.5	0.3	0.3	0.8	2.9	
Total as at 1.4.2013	1.2	0.3	0.3	0.8	2.9	
Feed	DTS	DCA	DCATS Qualified	(Unqualified but Competent)	Total	
TS Team Leader	0.1				0.1	
TSO	0.1				0.1	

Enforcement Officer		0.0		0.5	0.5
TS Assistant	0	0	0	0	0
Admin				0.1	0.1
Total as at 1.4.2018	0.2	0.0	0.0	0.6	0.8
Total as at 1.4.2017	0.2	0.0	0.0	0.6	0.8
Total as at 1.4.2016	0.3	0.4	0.0	0.5	1.2
Total as at 1.4.2015	0.3	0.1	0.0	1.0	1.4

Food Standards & Feed Standards: The 2.0 Trading Standards Officers undertaking food standards work hold the Diploma in Trading Standards or one of its antecedents necessary to allow officers to undertake food & feed standards inspections. One enforcement officer holds the Diploma in Consumer Affairs (DCA) together with the Food and Agricultural Standards paper, and another Enforcement Officer holds the Diploma in Consumer and Trading Standards (DCATS) Food qualification.

2 trading standards officers and additional enforcement officers have non primary producer/farm inspection duties. Inspection of feed on farms is the responsibility of two enforcement officers. All officers are suitably qualified and deemed competent, and carry out the assessments on an annual basis.

For staffing structure see Appendix C

The proportion of time spent by each officer on the feed and food function can be found below.

Table 4(b):

Food Standards Resources				
Food Standards Function	Estimate of Required Resources	Allocated		
Food Standards Interventions	2.1	1.8		
Food Standards Complaints	0.3	0.2		
Food Standards Home Authority / Primary Authority	0.3	0.2		
Food Standards Business Advice	0.3	0.2		
Food Standards Sampling / Incidents	0.2	0.2		
Food Hygiene Primary Production Inspections	0.1	0.1		
Liaison & Promotion	0.1	0.1		
Food Safety alerts	0.2	0.2		
Sub-Total	3.6	3.0		
Estimated additional resource required for Recovery of Backlog of Food Standards Work (short term: 2 years approx.)	2.1	0.0		

At current intervention rates, to achieve inspections targets as per the code of practice (that is, inspection of all A, B, C rated and Unrated businesses) and taking into account complaints and sampling work, the department would need to increase the number of full time equivalent qualified and competent officers to approximately 5.7 FTE to overcome the backlog, particularly unrated businesses, in a reasonable period of time (estimated as two years).

Unrated businesses are initially subject to a postal or e-mailed self-assessment questionnaire and are assessed by the food hygiene team during their registration and new

businesses phase for referral as necessary to Trading Standards- as per the protocol following the systems review discussed earlier in this document. This will allow Trading Standards to focus on the higher risk food standards businesses.

Once the backlog of inspections is recovered, to then maintain the inspection rate the department would need to maintain 3.6 FTE food officers.

Feed work provisions are now arranged regionally and funded directly by the Food Standards Agency.

3.1.4 Targets and Priorities for 2018/19 (including any planned projects)

Food Hygiene:

- To ensure a high level of Business compliance with Food Hygiene legislation.
 This is illustrated by the percentage of food businesses which are classed as "Broadly Compliant" when assessed against the definition provided by the National PI / Public Accountability Measure PAM 023: (formerly PPN/009) "The percentage of food establishments which are 'broadly compliant' with food hygiene standards";
- To undertake a suitable variety of Regulatory Interventions to promote good health and ensure legal compliance to avoid dangerous health risks. This will include the issuing and administration of the Mandatory Food Hygiene Rating Scheme which was introduced on 28th November 2013;
- To undertake inspections / interventions at high risk premises for food hygiene. (See table 2(a) for number of inspections due). This PI is based on doing 100% of Category A premises; and 100% of Category B premises. With respect of Category C premises, interventions will be part of a risk based strategy.
- 4. To inspect or otherwise assess new businesses for compliance with legal standards.

- 5. To respond to infectious disease incidents, complaints and enquiries within the target response time laid down by the Authority.
- 6. To promote the improved understanding and implementation of food safety management systems for food businesses in the County Borough.
- 7. To further develop a cross-disciplinary approach to undertake certain combined food hygiene and food standards assessments, following appropriate training and up-skilling of staff.

Food Standards and Feeding stuffs:

- 1. To achieve 100% of inspections/interventions of "A" rated premises for food standards & feed purposes
- 2. To assess businesses for compliance with basic legal standards, to ensure that significant breaches are acted upon and proper controls are evenly applied to all businesses in a fair and equitable manner.
- 3. To complete the annual food sampling plan
- 4. To complete the regional feed delivery plan
- 5. To continue to implement the Intelligence Operating model across the service.
- 6. To maintain competency and training for all relevant staff
- 7. To continue to support and develop the cross-discipline approach to undertake certain combined food hygiene and food standards assessments, following appropriate training and up-skilling of staff of officers from both teams.

3.1.5 Possible Restrictions on Providing Service

Due to limitations of staff resources, extended periods of absence can lead to a drop in service provision - this issue is constantly monitored.

It is important to maintain officer competencies across a variety of disciplines to continue to remain flexible and of optimum value when emergencies occur.

The section has had little turnover of food and feed qualified personnel in the last two years. However, 1 Environmental Health Officer (Food Hygiene) has been seconded into another section, to provide resilience due to new work demands. Additionally, 1 Food Hygiene Enforcement Officer is due to retire in May 2018. When a member of staff does leave, it is often difficult to replace them due to the restricted availability of suitably qualified officers.

The section has a wide remit, but food and feed standards work is a high priority.

Occasionally, projects and targets need to be re-assessed to focus on the areas of greatest need.

The department is focussing on the areas which require most attention and making use of the intelligence led approach advocated by National Trading Standards and have implemented the Intelligence Operating Model for Trading Standards. The new regime of Food Hygiene officers undertaking limited Food Standards work will help meet demand.

3.1.6 Experience of Officers and Access to Expert Information When Necessary

All relevant officers within the Section are appropriately qualified and experienced to deal with routine and many unusual matters associated with all current types of food & feed premises within the area. The EDR (Employee Development Review) and supervision review process means that officer's competency is continually monitored and training is delivered where needed.

Communication, reference and expert support:

The department has access to the following:

- Technical Indexes,
- Police National Legal Database,
- Knowledge Hub
- Coordinating groups and panels specialising in food and feed enforcement
- Public analyst (s)
- Email & Internet
- Trading Standards Regional Intelligence Analyst intelligence database and Local Intelligence Officer network.

Where additional expertise is required the Head of Service will be briefed and a suitable response will be formulated.

Where appropriate, assistance from the Food Standards Agency and other partners/colleagues may also be sought.

Co-ordinated enforcement:

Trading Standards has representation on the Glamorgan regional coordinating group for food standards.

Trading Standards participates in surveys and exercises held under the auspices of the Glamorgan Group, the Welsh Heads of Trading Standards (WHOTS) and the Food Standards Agency. Swansea Trading Standards represent Neath Port Talbot's interests in regional feed coordination. Regular communication takes place between the two authorities on feed issues and delivery of feed enforcement across the Swansea / Neath Port Talbot region.

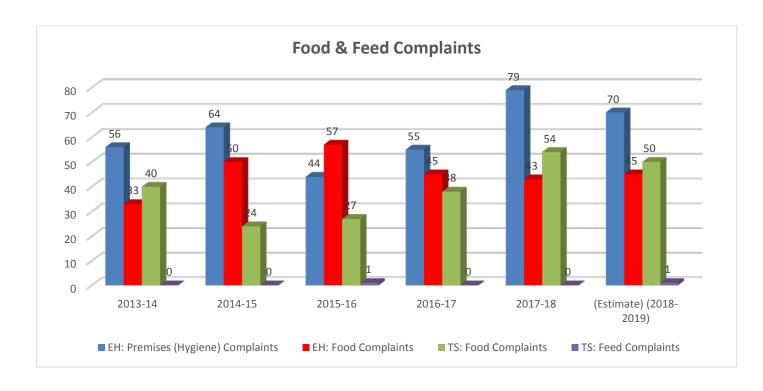
Food Hygiene and Health Protection work closely and liaise with the Public Health Laboratory, Public Health team of the NPHS, and the Public Analysts when expertise is required. The Authority's public analyst service is consulted during the drafting of the sampling programme for sampling subjects, costs and sampling techniques.

3.2 Food and Feeding-stuffs Complaints

The authority will continue to ensure that all notified complaints in relation to food and feeding stuffs are suitably investigated and dealt with promptly, consistently and as per the enforcement policy and internal policy and procedure.

The following graph illustrates number of complaints/ service requests received by the department

Table 5(a):



The reactive workload is equivalent to approximately 1.4 FTE- based on 1.2 FTE for food hygiene and 0.2 FTE for food standards and feeding stuffs.

The demands placed on this Reactive service are periodically reviewed, to ensure that resources for investigating food complaints are targeted on a risk basis. The available resources will need to be focused on significant food safety risks. As a consequence, certain categories of service request may receive a more streamlined response.

3.3 Primary Authority Scheme & Home Authority Principle

The authority will continue to provide advice and assistance to food businesses for which we are the originating authority and to any that may set up their decision making centre within the authority. The department has made a commitment to initiate Primary Authority partnerships, including food and feed. We will provide any relevant information to other food authorities that make enquiries about such businesses.

The Primary Authority scheme requires UK enforcement authorities to be mindful of national inspection plans organised with multi-site businesses, to ensure consistency of approach on a nationally coordinated basis (See also our Enforcement Policy and Primary Authority Policy). Potential enforcement action would need to be coordinated with the Primary Authority of the business involved.

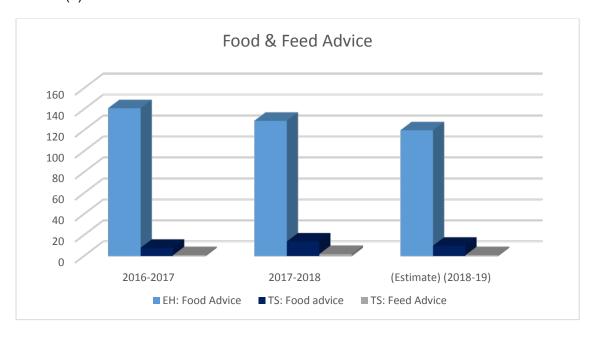
Elsewhere, where a breach is detected involving a company based in another part of the UK, liaison is instigated with the relevant local authority / authorities under the Home Authority principle.

Where significant food or feed breaches with a potential national or international impact occur, the department will liaise with the Food Standards Agency and relevant border inspection points / ports.

3.4 Advice to Businesses

From 2018/19, the EHTS department will be charging for the provision of certain business advice. The department will not charge for signposting businesses to basic sources of advice, but will charge for bespoke or enhanced consultancy type advice-such as examination of products, systems and labels. It is hoped that this will go some way to offsetting service provision costs.

Table 5(b):



There may be a small fall in demand for the service, but it is believed that this will be negligible. Existing departmental resources were sufficient to meet demand in the years prior to charging, and a similar (albeit slightly reduced) estimate is made for the year ahead.

3.5 Food and Feed Sampling

Food sampling trends, intelligence and Food Standards Agency priorities are examined, analysed and inform the authority's food sampling plan.

Priority areas for sampling are identified on the basis of safety, consumer or trade detriment, type of food or feed business and risk.

Additionally, food samples should be taken as part of a programmed intervention if deemed appropriate or in connection with enforcement investigations.

The Authority participates in various co-ordinated sampling programmes from such bodies as:

- Welsh Food Microbiological Forum targeted surveys;
- the All Wales 'Shopping Basket' Food Sampling Survey;
- Welsh Head of Trading Standards Surveys;
- Glamorgan Trading Standards Group Surveys;
- Public analysts co-ordinated surveys;
- Food Standards Agency surveys

The regional feed coordination plan means that there are specific sampling programmes led by the FSA.

Following the system review of the service, on-site 'screening' samples are no longer recorded, however the intention is for more 'formal' samples to be taken. Other internal sampling programmes can be carried out when necessary, and are incorporated into the annual plan of food sampling devised respectively by Environmental Health and Trading Standards.

Official Control Samples 250 200 150 100 50 2013/14 2014/15 2015/16 2016/17 2017/18 (Estimate) (2018/19)■ EH Food samples ■ TS Food Standards ■ TS Feed Standards

Table 5(c): Numbers of Official Control Samples, by year.

Resource allocation:

- approximately 3 days a month are spent by one officer (usually a Support Officer) sampling foods for microbiological analysis and undertaking the

subsequent administration. Results interpretation and any necessary follow up of failures are managed within the team by suitably qualified officers.

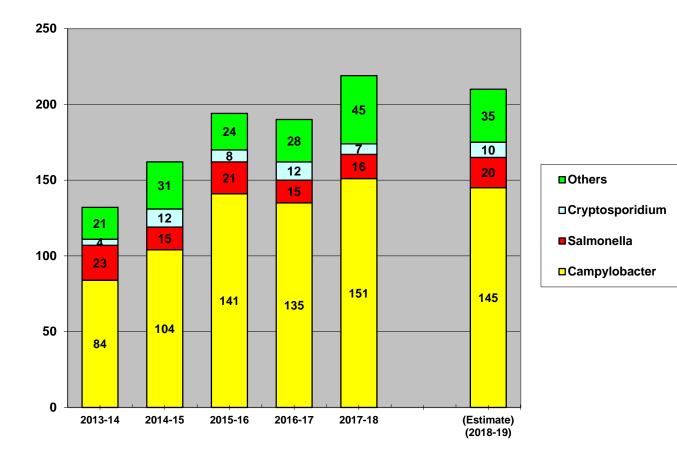
 Samples taken are submitted to either the local Microbiology testing laboratory (PHW- lab) or Public Analyst within 24 hours of sampling.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

All formal notifications (of all types of Infectious Disease notifications) are recorded on an NHS shared platform (called TARIAN). Subsequent investigations are based on the type of organism and the number of cases, and are in accordance with the over-arching Communicable Disease Outbreak Control Plan for Wales (re-issued September 2012 by Chief Medical Officer- Wales). Additionally, there are various supporting infectious disease investigation procedures utilised locally by Neath Port Talbot.

In 2018-19, the Microbiology laboratory at Singleton Hospital will move to a new advanced system of Molecular Testing- to assess for the presence of DNA of key micro-organisms of public health significance. It is likely that this will result in more isolates being identified and reported on for action by Environmental Health Departments within the region. This could result in an increased workload. Given the importance of these health protection measures, resources will be reconfigured to best deal with any significant changes in workloads. The subsequent demand on resources will be closely monitored.

Table 5(d): Graph to show Notifications of all Infectious Diseases, including Food-related



Periodically, we receive complaints from members of the public as self-referrals. These are often reported as suspected cases of food poisoning. Initially, advice is given for the case to report to their GP, and where risks are identified these are followed up as service requests. They are also reported to the NPT Consultant in Communicable Disease Control. Workloads are consistently high in this area of work, and where Emergencies / Major Outbreaks occur, they are dealt with as top priority, with other work being re-scheduled.

The existing internal resources are sufficient to deal with the estimated number of food poisoning cases for the forthcoming year.

3.7 Food & Feed Safety Incidents

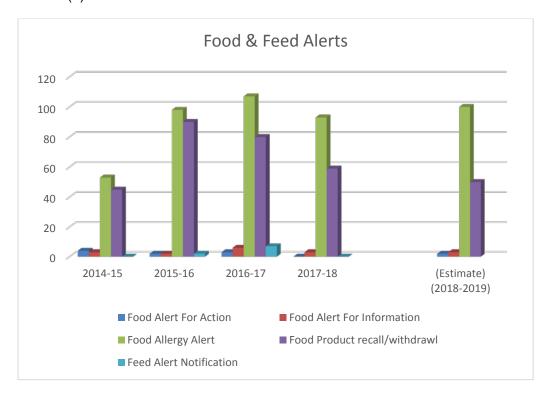
The service has a documented procedure which deals with action to be taken following the receipt or initiation of a food alert. In line with the COP the department uses the APP / Flare database for recording actions taken following a food or feed alert

Alerts are received by a direct email from the Food Standards Agency Wales (FSA-W) to enforcement officers. The warning procedure for food incidents recognises that Alerts for Action (FAFA) are required to be dealt with quickly, and are treated as a very high priority- which often take priority over other work of the sections. More often, Food Alerts for Information are issued. Most food alert warnings received require only a small amount of officer resource. However on occasions it will be necessary to provide more resources to deal with onerous alerts.

When required, affected businesses will be contacted and encouraged to commence a withdrawal, but where necessary, formal enforcement procedures exist to ensure an appropriate response.

Equally, the department will liaise with the Food Standards Agency Wales and other relevant agencies who will be contacted immediately using the agreed Food Incident report form/ mechanisms for breaches detected in NPT.

Table 5(e):



The department receives a significant number of allergy alerts, however few of these require action on the part of the food authority. Existing internal resources will ordinarily be sufficient to deal with the estimated number of food alerts / food incidents, as each inspecting officer also deals with reactive work.

3.8 Liaison with other Organisations

The authority has a number of arrangements to ensure enforcement action is consistent with neighbouring local authorities. Officers participate in a variety of external liaison groups, which are summarised below:

Table 6: Breakdown of resource allocation for liaison with other
organisations.

GROUP	AVERAGE RESO	NIBCE
GROUP	ALLOCATIO	
TS Glamorgan Food Group	4 days per year	1 Officer
TS NPT/Swansea Feed Region	4 days per year	1 Officer
TS Glamorgan Group	4 days per year	1 Officer
WHoTS Animal Health and Welfare Panel	4 days per year	1 Officer
WHoTS Group	6 days per year	1 Officer
WHoEHG Food Safety (Task Group & Technical Panel)	4 days per year	1 Officer
WHoEHG Communicable	4 days per year	1 Officer
Disease (Task Group & Technical Panel)		
WHoEHG: Environmental Health Group	4 days per year	1 Officer
Welsh Food Microbiological Forum	3 days per year	1 Officer
Meetings with CCDC	Estimate 2 days per year	1 Officer
Consultee to Building Control & Planning Department & Licensing Department.	Estimate 2 consultations per week	1 Officer
Regulatory Delivery	Estimate 2 days per year	2 Officers
Welsh Food Fraud Coordination Unit	Estimate 2 days per	2 Officers

	year	
National Food Crime Unit	Estimate 2 days per year	2 Officers
Ad hoc meetings with NPTCBC Education and Social Services Departments	4 days per year	1 Officer

Key: WHoTS = Welsh Heads of Trading Standards.

WHoEHG = Welsh Heads of Environmental Health Group

CCDC = Consultant in Communicable Diseases

3.9 Food and Feed Safety and Standards Promotion / Intelligence Gathering

Educational and promotional activities are considered to be important aspects in the delivery of a varied and comprehensive food safety service. The following table illustrates how this authority achieves this function.

Methods of Food & Feed Safety Promotion						
Food information available directly from the Food Safety section & Trading Standards section of the Council and via their websites.	Attending consumer education events, and disseminating information on the work of the department, including food and feed standards work.	Liaison with NPTCBC Procurement and Care services in respect of food issues and specifications of food supplied to Neath Port Talbot.	Targeted advice/ information sent to relevant groups on issues of county or national significance.	Active promotion of National Food Safety Week (e.g. through displays in the Local Shopping Centres, or through social media, or amongst local groups/ communities).		

Use of Local Intelligence Liaison Officer and Regional Intelligence Analyst (RIA)	Attendance and membership of regional feed and food liaison groups.	Targeted seminars and training sessions can be provided on subjects such as Food Safety Management System requirements-particularly aimed at high risk caterers, or high risk food sectors	Food hygiene courses can be offered by the service for external and internal candidates	Facilitating hand washing demonstrations in conjunction with local schools. Also, we facilitate presentations/ talks to pupils of local educational establishments including schools, colleges, universities and voluntary groups, when requested.
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The authority will continue to promote food safety and standards in all areas of its work. Most inspections are carried out pro-actively and include an element of the promotion of "best practices" by officers to ensure premises achieve good practices over and above the basic compliance of relevant legislation. Prospective business owners will be positively encouraged to seek the advice of the department before the food business opens to prevent possible food hygiene and standards contraventions from occurring. The department will be monitoring this latter point following the introduction of charging for business advice.

Part of the health promotion function, which deals with Businesses, is integrated within the food service delivery team. Although there is no specific staffing resource allocated to this function, the daily contacts which the Teams have with businesses are an important opportunity to positively influence the wider business community, their employed staff and customers.

Intelligence is shared initially via the authorities APP/Flare database system. In addition, the Knowledge Hub (reference site), FSSinet (food sampling system) Memex (All Wales Trading Standards intelligence database system) and EHC-net provide means of informal data and intelligence sharing, whilst more formal means are provided by the Memex system, and via the authorities intelligence officer (who sits in the Trading Standards Fraud team); the Regional Intelligence Analyst (funded by money administered by the National Trading Standards Board based in Newport) and the National Food Crime Unit.

4.0 RESOURCES

4.1 Financial Allocation

The table below provides a summary of actual expenditure and income for the Food Service.

Table 7					
Budget Figures					
Revenue Budget	Budget 2018/19				
Expenditure					
Staffing- Food Hygiene	419,835				
Staffing- Infectious Disease	46,648				
Staffing- Food Standards	84,470				
Staffing- Animal Feeding Stuffs	22,759				
Transport (TS)	7,115				
Transport (EH)	5,680				
Equipment (EH)	3,850				
Legal Fees – EH&TS (Centrally funded)	0				
Sampling & Analysis – Food Hygiene	260				
Sampling and Analysis – Trading Standards – Food & Feed only	18,000				
Total Expenditure	602,355				
Income					

Government Grant	0
Other Income	6,090
Total Income	6,090
Net Expenditure	596,498

4.2 Staff Development Plan

The department is committed to providing appropriate training for staff. A training and development plan is in place for the Environmental Health and Trading Standards Service. All food & feed enforcement staff participate in one-to-one supervisory review with a manager approximately every 6-9 weeks and an annual appraisal. Regular Food Hygiene Team meetings are held to discuss ongoing food and communicable disease issues. Trading Standards hold fortnightly briefing sessions to update staff on new developments in the field, business plan progress and administration issues.

The training and development budget for 2017/18 for the whole of the EH & TS service is initially set at £ 9,800. However, some additional funding from the receipts obtained from the Proceeds of Crime Act is ear-marked for use in providing enforcement training.

The Authority participates in the All-Wales Communicable Disease Lead Officer Training events funded by the Wales Centre for Health. All-Wales update training on food related topics is also provided by the Food Standards Agency on key issues, but is of necessity restricted to usually 2 officers per local authority, and is often free. Officers are expected to maintain their competencies, and undertake to ensure their continuing professional development (CPD) by undertaking suitable study or training equivalent to a minimum of 10 Hours per annum (from 1st January, annually). This is monitored by the respective service managers and discussed during the one to one reviews. There is considerable reliance placed upon the Food Standards Agency for external training in respect of food and feed standards matters.

4.3 Legal Expenditure

Legal fees and costs for taking action in connection with food standards and food hygiene cases have remained fairly constant over the past few years. Whilst there is no direct budget allocated for this purpose, resources are provided as needed from both the commissioning directorate and Corporate legal services, and costs incurred by both are applied for at the conclusion of the legal action- where there is an overspend/shortfall in resource, this is reported to the Head Of Service for subsidising on an ad-hoc basis, or from central reserves. Receipts from the Proceeds of Crime Act can be re-invested in enforcement related actions. There has been a moderate rise within food standards of cases referred for prosecution as significant infringements have been detected. This is likely to continue to persist over the coming years as intelligence indicates that there is continued infringement of allergen, adulteration and mis-description legislation within Neath Port Talbot.

5.0 QUALITY ASSESSMENT

5.1 The quality of the food service will be regularly assessed to ensure the Service Delivery Plan and Food Standards Agency framework agreement on local authority enforcement ('The Framework Agreement Standard') is being achieved.

Management monitoring

Evaluation methods to be used will include:

- Monitoring of performance measures is carried out on a Quarterly basis, and reported to the relevant Member forum for scrutiny. Additionally, ad-hoc internal checks are undertaken to monitor progress towards the Business Plan priorities.
- Monitoring of inspections by Senior EH officers and EH & TS Team Leaders.
- Monitoring of inspection reports and records.
- Officer reviews held every 6-9 weeks, plus an annual appraisal, which includes a competency assessment for food and feed enforcement as appropriate.
- Accompanied visits and Peer assessments- following internal protocols.

These evaluations are recorded.

The Food Standards Agency (FSA) has discretion to undertake audits (full or focussed) of food authorities, and their latest full assessment was undertaken in 2014, with a follow up visit in August 2016.

6.0 REVIEW

6.1 Review Against Service Plan

Strategically, the Head of Service and the Environmental Health & Trading Standards Manager has

overall responsibility for the direction and performance of the service.

The Environmental Health & Trading Standards Manager is the Accountable Manager for the food

hygiene, food standards and feed standards & hygiene functions.

The Manager reviews the key performance measures and service improvements contained in the plan on a quarterly basis as part of the performance management process, these are reported internally at quarterly intervals to Cabinet Board and the associated Scrutiny Committee.

6.1.1 Food Hygiene

In addition, regular meetings are held with the food hygiene team (food and health protection). This is to ensure that on-going projects, improvements and inspection targets outlined in this service plan and the business plan are effectively monitored and managed.

- Inspecting 100% of all High Risk premises for food hygiene purposes.
- Inspecting 100% of historic backlog of very low risk premises for food hygiene with the assistance of FSA grant funding.
- Issuing over 500 food hygiene ratings to businesses:
- Sampling food products in line with the all-Wales surveys of food quality
- Undertook a service review which resulted in the establishment of a proactive and reactive team which has reduced disruptions to scheduled work and as a consequence improved efficiencies.
- Reduced duplication between the food hygiene and food standards team through better working arrangements
- Served 14 hygiene improvement (enforcement) notices to ensure certain businesses met minimum legal standards;

6.1.2 Food Standards and Feeding stuffs

Key achievements for 2017/18 include:-

- Inspecting 100% of high risk premises for food standards purposes.
- Participating in the Glamorgan Group of Trading Standards Authorities coordinated sampling exercises.
- Continuing to exercise vigilance into the supply of illegal and counterfeit alcohol, both on inspection and as part of coordinated sampling exercises.
- Delivering food standards training to school catering staff and FBOs.
- Continuing to assist with procurement of food supplied with that described in the local authority specifications, investigations on failures are ongoing.
- The sampling of food supplements. As part of the operation OPSON international monitoring exercise.
- Investigating breaches of composition (illegal ingredients often harmful to consumer), labelling and descriptions. This work will continue into the next financial year.
- Continuing to identify and investigate a number of food fraud offences at takeaways and restaurants involving the substitution of beef for lamb in meals, and the presence of prohibited colours.
- The continued delivery of advice to traders in respect of allergen information provision and the establishment and maintenance of allergen control systems. This has been identified as a priority area, and will continue into the new financial year.
- Meeting the targets set by the new WHOTS/FSA regional feed delivery group.
- The continued development of a coordinated enforcement plan with Food Hygiene

6.2 Identification of Variation from the Plan

Variations from the Service Plan will be identified annually. Reasons for the variance and whether or not these are justified will also be given.

Trading Standards has a large backlog of inspectable businesses for Food Standards purposes. This is due to other work of a higher priority taking precedence and the identification of a number of lower ("C") rated businesses (such as child minders) that the department's existing resources will not currently allow it to visit. Accordingly, the department focussed on the areas of highest risk, i.e. "A" rated premises and made use of a contractor for the last 6 months of the year to contribute interventions at "B" and "C" rated premises. However, the introduction of the food hygiene team in carrying out inspections of key food standards issues at specific "C" rated food standards and unrated businesses will help to alleviate the pressure. Proactive inspections will continue to be subject to the same competition for resources as other work, and will be prioritised as necessary.

With regard to food hygiene interventions at lower risk rated premises, the previous backlog has been addressed. However, there remains a risk that priority will remain with resources being directed at inspection of higher risk and investigation of non-compliant premises.

6.3 Areas for Improvement

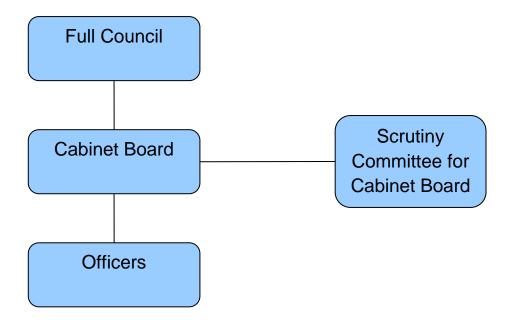
Over the past 5 years, the changes to food safety legislation and the challenges faced by food safety enforcement authorities have been significant. National priorities continue to be influenced by the Food Standards Agency, Regulatory Delivery, and National Trading Standards (NTS), as well as the impact of the final report form the South Wales E.coli O157 public enquiry, and the ongoing visits from the EU Food & Veterinary Office to Welsh Authorities. Consequently, the food service will need to respond to these and improve the service further, particularly in light of funding challenges. However, some of the current planned improvements for 2018/19 and beyond include:-

1. Reviewing out of hours provision and cover arrangements in relation to

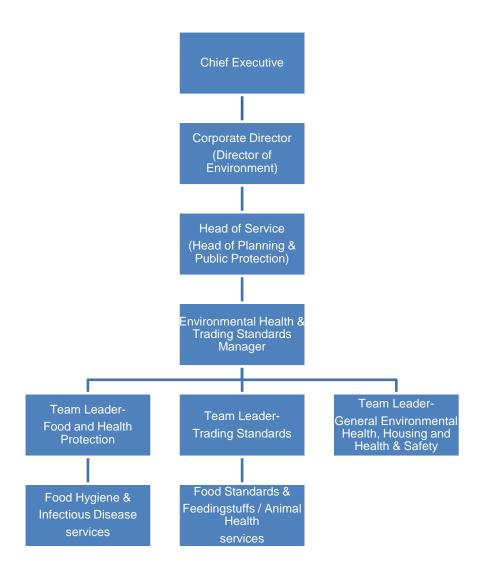
- outbreaks of communicable disease and service delivery- particularly emergencies;
- 2. Developing a training programme for officers involved in the investigation of outbreaks of communicable disease
- 3. Undertaking suitable promotional activities / campaigns.
- 4. Establishing measures to assess the quality of the service provided
- 5. Consulting more with stakeholders
- 6. Continuing to review food standards, food hygiene (primary producers) and feed legislation in relation to qualification of officers and demands on the service
- 7. Continuing to develop the coordinated food hygiene / standards intervention programme, as highlighted by the internal 'System Review' process.
- 8. It is anticipated that the implementation of the agile working pilot scheme within the two services will improve service provision.
- 9. Continuing to develop the use of the Intelligence Operating Model for Trading Standards.
- 10. Continuing to improve the use of alternative enforcement strategies in relation to food inspections.
- 11. The challenges regarding local government reorganisation or regional collaboration
- 12. Addressing the demands on the service from the Food Standards Agency paper "Regulating Our Future".

APPENDIX A

Decision Making Structure:

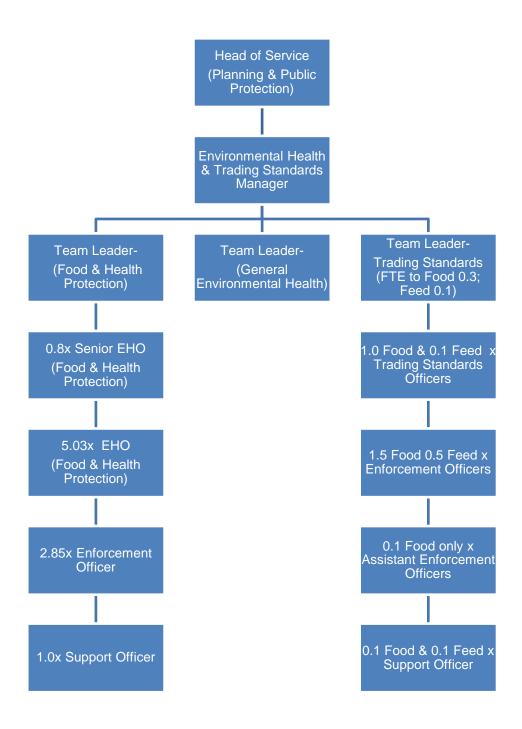


Department Structure:



APPENDIX C

Service Structure: (As at 1/4/2018)



APPENDIX D

Number of Registered Food Premises by Ward (2017 & 2018)

WARDS:	(WARD	2017	2018	WARDS:	(WARD	2017	2018
NEATH	CODES)			PORT TALBOT	CODES)		
Aberdulais	ABD	14	15	Aberavon	ABV	83	77
Alltwen	ALL	12	14	Baglan	BAG	40	41
Blaengwrach	BLA	14	12	Briton Ferry East	BFE	51	43
Bryncoch North	BRN	22	22	Briton Ferry West	BFW	15	13
Bryncoch South	BRS	36	36	Bryn and Cwmavon	BRY	51	52
Cadoxton	CAD	10	11	Coedffranc Central	COC	46	44
Cimla	CIM	19	21	Coedffranc North	CON	10	10
Crynant	CRY	15	15	Coedffranc West	COW	44	43
Cwmllynfell	CWM	12	14	Cymmer	CYM	32	32
Dyffryn	DYF	27	26	Glyncorrwg	GLC	11	10
Gwaun-cae- Gurwen	GCG	27	26	Gwynfi	GWY	11	11
Glynneath	GLN	37	36	Margam	MAR	50	46
Godrergraig	GOD	4	7	Port Talbot	POR	84	75
Lower Brynamman	LBR	8	8	Sandfields East	SAE	48	42
Neath (East)	NEE	47	44	Sandfields West	SAW	38	38
Neath (North)	NEN	145	149	Taibach	TAI	41	41
Neath (South)	NES	21	21	Port Talbot area Total		654	618
Onllwyn	ONL	9	10				
Pelenna	PEL	11	9	Other / Out of area	XXX	0	0
Pontardawe	PON	90	91	NPT Combined Total		1349	1309

Resolven	RES	25	21		
Rhos	RHO	14	12		
Seven Sisters	SEV	19	18		
Tonna	TON	20	19		
Trebanos	TRE	7	7		
Ystalyfera	YST	28	27		
Neath area Total		693	691		

ENVIRONMENTAL HEALTH AND TRADING STANDARDS SERVICE

Review of Food and Feed Law Enforcement Performance 2017 / 2018

1.0 Introduction

In May 2014 the Food Standards Agency (FSA) carried out an audit of the Food and Feed law enforcement services of Neath Port Talbot County Borough Council. The audit was undertaken to ensure compliance with the Framework Agreement (2010). An action plan was agreed to implement a number of recommendations to improve the service in areas identified by the audit report.

3.27(ii) of the Action Plan recommended that the authority:-

"carryout an annual food and feed law enforcement performance review for approval by the relevant member forum or senior officer, as appropriate (The Standard -3.2)"

This is the aforesaid review, submitted to the Head of Planning and Public Protection for approval.

2.0 Planned inspections/interventions 2017/2018:

2.1.0 Food Hygiene:-

RISK	NUMBER OF	BALANCE OF NEW /	NUMBER	OUT-TURN / ACHIEVED
				OOT-TORN / ACHIEVED
CATEGORY	PREMISES	OLD INTERVENTIONS	PREMISES	
	CARRIED	DUE / PLANNED BY	INSPECTED /	
	FORWARD	31/3/2018	INTERVENTIONS	
		(TO EXCLUDE ANY	ACHIEVED AS AT	
		PREMISES WHICH	31/3/2018	
		CEASE TRADING)		
High Risk:-				
Α	0	7	7	100%
В	0	41	41	100%
С	0	280	280	100%
Low Risk:-				
D	31	71	71	100%
		(31 old + 40 new)		
E	295	317	317	100%
		(295 old + 22 new)		(mainly via AES:
				Alternative Enforcement
				Strategy).

Commentary:

Resources were prioritised on undertaking all High Risk food premises. An initiative to address the backlog of lower risk premises (focussing on 'Category D' and 'Category E' rated premises) was completed, with the assistance of some additional external funding from the Food Standards Agency- Wales. A grant was provided by the FSA to fund additional resources for consultants to clear an historic backlog of food hygiene premises. This highlights the fine balance between current resources and the inspection programme.

2.1.1 Broadly Compliant PI: (PAM009)

The out-turn PI for 2017/18 was: 94.76% (based on 995/1050 premises achieving a 3/4/5 FH Rating).

2.1.2 Food Hygiene Ratings:

617 Food Hygiene inspections were undertaken, and Food Hygiene Ratings issued where applicable;

40 Food hygiene re-ratings were applied for and progressed;

The FSA website had regular uploads of data (at least every 28 days), and additional ad-hoc uploads were undertaken to take account of important in-month changes.

2.2 Food Standards : Planned Interventions

RISK	NUMBER OF	BALANCE OF NEW /	NUMBER PREMISES	OUT-TURN /
CATEGORY	PREMISES	OLD INTERVENTIONS	INSPECTED /	ACHIEVED
	CARRIED	DUE / PLANNED BY	INTERVENTIONS	
	FORWARD	31/3/2018	ACHIEVED AS AT	
		(TO EXCLUDE ANY	31/3/2018	
		PREMISES WHICH		
		CEASE TRADING)		
	_			
A	0	11	11	100%
(every 12 months)				
B	58	109	87	79%
(every 24		(58 old + 51 new)		1070
months)		,		
C	411	468	172	37%
(every 5		(411 old + 57 new)		
years)				
UNRATED	409	409	114	28%
(not yet				
visited)				

Resources were directed to inspecting the A, B and Unrated businesses within the county borough. C rated (low risk) businesses as a consequence are being de-prioritised from the inspection programme. The department is however looking to address this shortfall by the use of alternative enforcement questionnaire, developed in conjunction with the food hygiene team. Additionally, food standards inspections of certain C rated and some unrated businesses will be carried out by environmental health officers at the same time as their food hygiene inspections. Finally, following Food Standards Agency advice, many businesses have been brought back into the inspection programme. Some extra resources have been secured to address the extra and over-due inspection work, however there remains a lag.

Trading Standards is generally intelligence led and the main focus of food standards work is on catering premises, particularly in addressing concerns on allergens, presence of illegal or restricted colours and the adulteration or substitution of food. Furthermore it continues to take part in coordinated operations and enforcement in the field of food supplements, an area that is complex and has been the subject of numerous food safety warnings. Consequently, the department is directing resources to this area.

Progress on interventions and quality checks are monitored by the Trading Standards Team Leader via spot checks, accompanied visits, annual appraisals and quarterly staff review meetings.

2.3 Feed Standards: Planned Inspections

Feed enforcement within Wales is now funded directly by the Food Standards Agency, and administered by the Welsh Heads of Trading Standards (WHOTS). Wales is divided into regions, Neath Port Talbot and Swansea form one of these regions. Co-ordination across the Swansea / Neath Port Talbot area is delivered by an officer from Swansea Trading Standards, the Trading Standards Team Leader in Neath Port Talbot acts as liaison with Swansea.

The feed inspection programme is drafted by WHOTS and the FSA based on the feed registers from each authority. The FSA categorises feed businesses by feed registration and approval type. These businesses are required to be inspected during the forthcoming year. Each region is expected to carry out inspections at those premises.

Neath Port Talbot and Swansea met their feed inspection targets last year. Whilst there were inyear changes to the registration and approval register, replacement businesses were identified for inspection with agreement from the FSA.

The inspection programme is coordinated by the City & County of Swansea. This year the inspections were an even split. In addition, Neath Port Talbot also completed inspections of 4 manufacturer premises.

Type of Business	Swansea / Neath Port Talbot Inspection Programme	Inspections completed by Neath Port Talbot
Manufacturer	0	4
Co Product Producer	0	0
Mobile Mixer	0	0
Importers	0	0
Stores	1	1
Distributor	0	0
Transporter	0	0
On Farm Mixer - R10	3	2
On Farm Mixer - R11	2	2
Supplier of Surplus Food - R07	7	7
Sub Total: Inspections Inland Feed	13	16
PRIMARY PRODUCTION		Profiled Inspections
Livestock Farms - R13	79	46

PRIMARY PRODUCTION		Profiled Inspections
Livestock Farms - R13	79	46
Arable Farms - R14	5	1
Sub Total: Inspections At Primary Production	84	47
TOTAL INSPECTIONS	98	71

The Food Standards Agency is satisfied with the delivery of the feed enforcement service across Wales.

3.0 Samples:

3.1 Food Hygiene:-

Samples were mainly taken in accordance with the National Sampling priorities, as agreed via the Welsh Food Microbiological Forum (WFMF). Additionally, local sampling initiatives were undertaken to increase the monitoring of locally available products, and to maximise the benefit of sampling allocations in conjunction with Wales Public Health Laboratory, based at Glangwilli Hospital, Carmarthen. During the period 1/4/2017-31/3/2018, 207 samples were taken, of which 169 were Satisfactory; and 29 were classed as Borderline (but not a fail), and 9 were Unsatisfactory.

Satisfactory samples do not attract any further action.

All borderline samples are followed up with an advisory letter to encourage reviews of pertinent controls, such as temperature controls; stock rotation; handling practices.

All unsatisfactory results are subject to follow up actions ranging from providing advice regarding improvements to undertake, together with further sampling, through to removing products from sale and taking robust enforcement action.

3.2 Food Standards

The Trading Standards Team Leader acts as chair for the Glamorgan Food Group. Coordinating and arranging the regions sampling programme.

Sampling initiatives are intelligence led, and last year focussed on:

- Food supplements, such as body building powder, vitamins etc. that are sold from health food shops, on-line and gyms
- Sampling from takeaways and catering establishments in relation to substitution of
 ingredients, mis-description of meals, illegal use of colours and non-declared allergens.
 Note: These areas and this trade sector have been identified as a priority due to the level of
 infringements nationally and the potential for harm.

Sampling and any subsequent investigations are monitored by the Trading Standards Team Leader via spot checks, annual appraisals and quarterly staff review meetings.

3.3 Feed Standards

The new regional co-ordinated framework agreement has led to more support being available for taking samples. As part of the regional sampling programme and in line with the national priorities for sampling, the service took 5 samples, none of which failed on analysis.

4.0 Service requests / reactive work:

4.1 Food Hygiene:-

Service requests- all types = 727

Of which:-

FNA (Food new business- advice for speculative start-up) = 31.

FNB (Food new business- advice & advisory interventions prior to trading) = 98.

FNC (Food new business- trading) = 65

Also, the Food & Health Protection service received the following:-

Infectious Diseases- notifications of cases/incidents = 236.

Whilst target response times have been established for all service requests, a further analysis will be undertaken to ensure that they remain fit for purpose, and that prioritisation of resources (in accordance with lean systems principles) will ensure the best utilisation of resources, whilst managing expectations of service requestors.

4.2 Food & Feed Standards

The department received 14 requests for food advice last year that were not as the result of an intervention. These varied from business start-ups to specific issues.

There were no requests for feed advice.

Through the Citizens Advice Consumer Service (CACS) and other means, the department received 54 food complaints during 2017/18. Most of the complaints related to the sale of out of date food (best before and use by). The businesses were advised and followed up as appropriate.

There has been little information from the public in relation to description (including presence of allergens) of food within NPT, this is notable considering the levels of infringement found when the department carries out interventions.

No feed complaints were received.

The department received 155 food alerts. The majority of these were allergy alerts, regarding food that failed to declare the presence of an allergen or did not display the presence prominently enough. As with Food hygiene these are mainly dealt with by support staff. Where necessary they will be escalated by the Trading Standards Team Leader. No feed alerts were received.

Requests for advice and complaints are fed into the authority's intervention plan which in turn leads to the identification of priorities and work areas for the forthcoming year.

Response times and investigations / advice are monitored by the Trading Standards Team Leader via spot checks, annual appraisals and quarterly staff review meetings.

5.0 Promotional work:

5.1 Food Hygiene promotional work:-

The service was able to use various social media platforms to pass on messages relating to food safety topics- particularly the re-tweeting of information from the Food Standards Agency.

5.2 Food Standards Promotional work:-

The section has assisted other departments in promoting business support and advice sessions by contacting local FBOs (Food Business Operators) to raise awareness of planned events.

In conjunction with Swansea Trading Standards and the Food Standards Agency, the department ran allergen training events aimed at caterers at the beginning of the year.

The section identified specific issues to advise businesses on, and advice was sent out via mail and e-mail to the relevant FBOs. This focussed:

- Food allergen advice to retailers, manufacturers and caterers.
- Takeaways / chip shops use of colours and substitution / description
- DNP (a harmful chemical found in food supplements)

5.3 Feed Standards Promotional Work

New feed businesses are regularly identified and contacted to ensure that they are properly registered.

6.0 Primary Authority:

6.1 Food Hygiene, Food Standards and Feed Standards-

The Primary Authority scheme is UK wide and each LA must have regard to any established partnerships between businesses and regulators. Whilst currently there are no food business partnerships which NPT are responsible for, there are many which NPT must have regard to during the inspection of premises within the borough. NPT Trading Standards have begun drafting their first Primary Authority relationship. This is with a non-food business. Dependent on its success the scheme may be offered to other businesses within the county borough. Where such partnerships exist, and cover businesses operating with NPTCBC, we liaise with the relevant LA's to give specific feedback following inspections which are subject to an agreed (UK wide) inspection plan, and general feedback where problems are discovered.

7.0 Safety Incidents:

7.1 Food hygiene:-

No food safety incident reports (e.g. withdrawals) necessitated initiation by EH of NPTCBC.

All notifications of withdrawals requiring specific action are prioritised.

7.2 Food Standards

No food safety incident reports (e.g. withdrawals) necessitated initiation by TS of NPTCBC.

All notifications of withdrawals requiring specific action are prioritised.

7.3 Feed Standards

No Feed safety incidents were recorded.

8.0 Staff Development / Training / Continuing professional development:

8.1 Food hygiene:-

All staff have achieved their expected CPD (which is set at a minimum of 10 hours per calendar year); additionally:

1 officer (REN) was seconded into another team to deal with new workload pressures. 1 temporary member of staff (KAB) was appointed on a short term contract to cover and backfill. The new officer was provided with induction training and followed a structured training programme to facilitate undertaking food hygiene enforcement duties.

8.2 Food Standards

All but one of the food qualified officers met their required 10 hours CPD in 2017/18. The officer that failed to meet the CPD requirements was on long term sickness leave. Training was achieved by a combination of courses run by the Food Standards Agency, Welsh Heads of Trading Standards, online courses run by the FSA and workshops run within Neath Port Talbot. An officer of the department completed their food standards qualification, and was awarded for achieving the highest pass mark in the Wales region.

8.3 Feed Standards

Only two (out of 5) members of the team met their required 10 hours CPD in 2017/18. This was due to a lack of opportunities for training. Two officers carry out the feed inspections on farms which is the bulk of the enforcement programme, these officers are required to be competent, but don't necessarily need a specific qualification. There is a smaller number of feed inspections at factories and stores that need to be carried out specifically qualified officers- in Neath Port Talbot these are Trading Standards Officers.

The training that was delivered was a combination of courses run by the Food Standards Agency, Welsh Heads of Trading Standards, online courses run by the FSA and workshops run within Neath Port Talbot Standards. A programme of internal training sessions will be developed to help meet this requirement where there this a shortage of opportunities supplied by external agencies.

9.0 Monitoring:

9.1 Food hygiene monitoring:-

LAEMS (Local Authority Electronic Monitoring System) data is provided annually to the Food Standards Agency- which gives detailed information on the key performance statistics for each Council across the UK, for submission to EU. The detail covers areas such as: intervention totals and by risk category; enforcement actions; number of premises by type and risk categorisation; samples taken; staffing levels; certain service requests etc.

On a quarterly basis key performance indicators are reported to Scrutiny Committee and the associated Cabinet Board, and are publically available.

Line managers keep track of inspection targets, and the reactive workloads on a monthly basis, or more frequently when required.

9.2 Food & Feed Standards monitoring:-

LAEMS data is provided annually to the Food Standards Agency- which gives detailed information on the key performance statistics for each Council across the UK, for submission to EU. The detail covers areas such as: intervention totals and by risk category; enforcement actions; number of premises by type and risk categorisation; samples taken; staffing levels; certain service requests etc.

Each officer's intervention programme is set at the beginning of the year. This is reviewed and updated during the relevant officer's quarterly review. Section progress is checked on a quarterly basis, key performance indicators are reported to Scrutiny Committee and the associated Cabinet board, and are publically available.

The TS Team Leader monitors officer inspection targets and reactive workloads formally during the quarterly review. If issues with performance are identified, this frequency is increased. Food / Feed Aide Memoires and post inspection reports are reviewed by the Trading Standards Team Leader.

Feed standards inspections progress is fed back to WHOTS and the FSA via the regional lead officer. The Trading Standards Team Leader and regional lead identify and address issues with performance against the inspection programme

10.0 Review of Policies/Procedures

10.1 Food Hygiene / Food Standards / Feed Standards:

All major food policies and procedures are kept under review, with in-year updates made when necessary.

11. Conclusions

Food hygiene, and Food & Feed standards enforcement remains a priority for the service.

Food hygiene inspection resources were prioritised on undertaking all high risk food premises. An initiative to address the backlog of lower risk premises (focussing on 'Category D' and 'Category E' rated premises) was completed, with the assistance of some additional external funding from the Food Standards Agency- Wales. The broadly compliant indicator remains consistently high- this is a National Performance Indicator. National and local food sampling initiatives were carried out throughout the year, and we will continue to take part and make use of sampling resources made available. The new business team within the Food and Health Protection team continued to contribute to providing advice and coaching to businesses prior to the start of trading, in an attempt to give businesses relevant good practice and to inform them of their legal requirements. However, in light of mounting budgetary pressures, a new Policy for charging for Business Advice was developed and approved by Members, to commence in 2018/19.

Additionally, mid-way through 2017/18 a detailed "Systems Review" commenced to review the inherent systems followed within both the Food & Health Protection team, and the Trading Standards team. Primarily to review opportunities for more harmonised working, to reduce overlap or duplication and explore more efficient ways of delivering services. Key findings (particularly moving towards Agile working, and reducing 'system waste') will be incorporated into a system redesign, due in 2018/19.

The new feed arrangements appear to have been a success, and the section will exploit the regional connections that have been forged. There are clear issues with the number of interventions for food standards over the past year and resources have been allocated to address this. Regional working and intelligence gathering should continue to be developed and there are clear priorities for the service in relation to both food standards and feed standards and these need to be addressed, but without ignoring other issues that are appearing on the horizon.

12. Review of report by Head of Service

I have reviewed and approve of this report.

Nicola Pearce

Head of Planning and Public Protection