



Food Safety Law Enforcement Plan 2013/14

1. SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

The Council's Regulatory Services is **committed to the protection of the public.**

As a competent Authority under Regulation (EC) 882/2004 and a statutory Food Authority under the Food Safety Act 1990, the Council seeks to ensure that all food and drink intended for sale for human consumption which is produced, stored, distributed, handled or consumed within Argyll and Bute is without risk to the health or safety of the consumer

Regulatory Services achieve this through the following aims and objectives:-

- Undertaking the statutory enforcement role of the "Food Authority", working with and in accordance with Service standards and specific requirements and guidance from the Food Standards Agency Scotland. This includes the Framework Agreement which outlines the responsibilities of the "food authority" and the Food Law Code of Practice.
- Provision of an effective, quality food service focusing resources on a risk-based approach and ensuring that all enforcement activity is proportionate, consistent and undertaken by competent and authorised officers.
- Developing, and working to a service plan, which will describe the work to be undertaken and identify the resources available to the Service.
- Provision of food safety advice and respond appropriately to requests from the public, voluntary groups and businesses and provide advice on food safety issues.
- Working with local businesses in an open and transparent manner, to improve the safety of food and the level of compliance with relevant legislation, in line with the Service's Food Safety Enforcement Policy, the Enforcement Concordat and the principles of Hampton and better regulation.
- Ensuring the effective management of the Council's food safety law enforcement service through effective performance management and reporting
- Contributing as a participant where it is relevant and appropriate having regards to local and national food safety issue as a member of a range of national and regional working groups recognising their role in the promotion of consistency and best practice among local authorities.
- Maintaining adequate systems including a computer-based inspection and reporting system, designed to improve the quality of food law enforcement activity data, management information and reporting

1.2 /....

1.2 Links to Corporate Objectives

This plan links to the Single Outcome Agreement and to the Council's Corporate priorities of protecting the environment; the economy through supporting new and existing business; and protecting health. More importantly, it allows the Council to meet its regulatory duties as a food authority.

2. BACKGROUND

2.1 Profile of the Local Authority

Argyll and Bute Council is a unitary authority, with a resident population of 90,550 and a geographical area of 693,500 hectares, including 26 inhabited islands, located within the west highlands of Scotland.

2.2 Organisational Structure

Regulatory Services delivers the Council's statutory food safety law enforcement role in a team which provides the range of services within environmental health, animal health, trading standards and licensing standards. This service is located within the Development and Infrastructure Directorate in a Planning and Regulatory service.

Regulatory Services is managed at a third tier level through the Regulatory Services Manager with operational management being provided by the Environmental Health Manager (East); Environmental Health Manager (West) and the Trading Standards Manager. There is no specific food safety law enforcement team as officers undertake generic work relating to their profession, although management lead for food safety is taken by the Environmental Health Manager (West) supported by the Environmental Health Officer (Food Control and Service Support).

The work of Regulatory Services can be directed to the Planning, Regulatory Services and Licensing Committee or the Full Council as determined by the nature of the report. In addition, the Service has access to the Area Committees and the Argyll and Bute Licensing Boards.

The statutory appointments required under Regulation (EC) 882/2004 and the Food Safety Act 1990 are:-

Head of Food Safety	Regulatory Services Manager
Lead Officer Food Hygiene and Standards	Environmental Health Officer (Food Control and Service Support)
Lead Officer- Feed	Trading Standards Manager

2.3 The Scope of the Food Service

Food Safety law enforcement is undertaken principally by authorised Environmental Health staff, although some work is undertaken by Animal Health and the feed aspects by Trading Standards professionals. We have been, and continue to, review roles and

responsibilities in respect of food and feed, as far as the Code allows, to integrate work across disciplines so we can make better use of the wider service resource.

- Environmental Health professionals are responsible for the Council's Food Safety law enforcement work, which encompasses food hygiene, food standards and control, (which includes food premises inspection, food quality, composition and labelling inspection and certification). In the event of systems failures, the team will respond by investigating and controlling communicable disease, investigating complaints and reports and withdrawing unsafe/unsound food.
- Trading Standards staff undertakes work in relation to animal feeding-stuffs controls although there are links into food standards through misleading claims..
- Animal Health Officers undertake primary production activities which include integrating food hygiene and feed into the animal health inspection for targeted businesses. .

The service priorities detailed in the Food Safety Law Enforcement Service Plan, which also includes as an appendix, the Feed Enforcement Plan are determined through statutory activities; the Food Law Code of practice; national, local and service priorities. The Council's Enforcement Policies, food safety procedures and internal monitoring and standards inform the standards for this work.

2.4 Laboratory Arrangements

The Council has a formal Service Level Agreement with Glasgow Scientific Services (GSS) for the provision of laboratory services, including the microbiological examination of foodstuffs. We are required to provide specialist support services and this plan seeks approval of Glasgow Scientific services and named staff to meet the requirements for a public analyst; food examiner and agricultural analyst.. Formal arrangements are in place for 2013-14 and these appointments (Appendix II) form part of the formal endorsement of this plan

2.5 Professional Support Network

The Service works closely with the Food Standards Agency Scotland, the Scottish Food Law Enforcement Liaison Committee, the Crown Office (Procurators Fiscal) and NHS Highland. The Service benefits from the support of the Royal Environmental Health Institute of Scotland, the Society of Chief Officers of Environmental Health, and the Trading Standards Institute.

The Service values and participates as is appropriate and relevant to do so, within established inter-authority liaison and professional network mechanisms operating within Environmental Health and Trading Standards in Scotland. Of specific note are the FSA Shellfish Enforcement Group, the SFELC Approved business Inspection Working Group, the Food Hygiene Information Scheme Working Group, West of Scotland Food Liaison Group; Environmental Health/ NHS Highland Liaison Group; the Scottish Fish and Shellfish Hygiene Working Group and SCOTSS Animal Feedstuff Group. The Service is also a subscribing member of Camden BRI.

2.6 Food Safety in Argyll and Bute

The nature, type and scale of food businesses in Argyll and Bute are influenced by its geography and infrastructure and these factors can create some difficulties in delivering the Environmental Health service. Examples of these are:-

- A high number of incidents and trade withdrawals with a regional and international scope. This also has a significant impact on the work of the Service.
- An atypical high number of approved manufacturing and processing food establishments, utilising specialist processing techniques and technology and Home Authority requests for assistance and advice.
- A significant seafood industry, which has a significant impact on the work of the Service and includes a separate shellfish team, which delivers the monitoring programmes for biotoxin and classification of shellfish harvesting waters through a contract with the Food Standards Agency.
- Decentralised Area offices pose specific challenges to ensure that there is adequate support provided to field staff and to ensure and promote consistency. This support includes training, specialist support, quality auditing and the management and direction of staff within the decentralised Area offices.
- There is a significant officer time spent travelling as part of their operational work. The Service is seeking to reduce this through the flexible and mobile working, through integrating roles where practical with other officers and the improved use of information technology, with the objective of improving productivity.

2.7 Uniqueness of Argyll and Bute Council as a “food authority”

- 2.7.1** The Service has responsibility for 1590 food premises in Argyll and Bute excluding the businesses which operate on a temporary or ad-hoc basis. The premises are divided into risk inspection bands.

The premises which will be subject to a formal intervention in 2013-14 total 537

Category	Minimum Inspection Frequency	Number of Establishments to be inspected 2013=14
A	Every 6 months	11
B	Every 12 months	86
C	Every 18 months	351
D	Every 2 years	59
E	Use other intervention strategies	30

- 2.7.2** We have identified that the implementation of the *E.coli* guidance from the Food Standards Agency cannot be achieved, within a managed timescale, unless there are allowances made by the FSA to relax the burden of the programmed inspection frequency for medium risk premises. This view has been supported by the Society of Chief Officers of Environmental Health in Scotland and also the Scottish Food Safety Liaison Committee.

We are current evaluating the resource allocation required to deliver the E.coli 0157 strategy and this will be assessed against the planed intervention programme required by the Code. We have yet to identify whether there is a need to request a “PI holiday” from the Food Standards Agency for medium risk premises. This decision will be made by the Regulatory Services Manager once the priority businesses have been identified for the E.coli 0157 strategy. Members are asked to endorse the decision of the Regulatory Services Manager.

There are 67 approved establishments (smokeries, shellfish processers and harvesters etc) compared to other Scottish Local Authorities, this amounts to the third highest number in Scotland. These operate processes that potentially pose a higher risk to food safety and fall to be inspected by the Service more frequently and in greater depth. A significant proportion of them use critical ingredients within traditional 'artisan' style products. The technical challenge in Approving such processes, together with the ongoing verification of safety, during inspections is significant. These establishments also embody increased political risks for the Council and commercial risks and opportunities for the local economy, in that they distribute high risk products throughout the UK and in fact globally

Fish processing	Shellfish Processing	Dairy	Meat / meat products	Egg Products
28	23	7	6	3

Consistent with Council Policy in Argyll and Bute, the Service will continue to work with these businesses to promote food safety standards.

- 2.7.3** Argyll and Bute Council has 43 classified shellfish harvesting sites (the second highest in Scotland, with Shetland Islands with 48), with a further 8 sites currently undergoing the classification process. These waters are classified for the growing and harvesting of shellfish and there may be restriction in their use due to the microbiological quality of water or shellfish flesh. The Service undertakes a monitoring programme which is designed to ensure that shellfish being harvested are safe in food safety terms. These also require businesses to continue trading as there is a requirement for all waters to have a minimum of six samples annually to maintain their classification. This work is undertaken by a dedicated team of four Officers who also carry out the shellfish biotoxin sampling work which is funded directly by the Food Standards Agency Scotland.

3. SERVICE PLANNING PROCESS

3.1 Service Plan

The Food Safety Service Plan is submitted to the Planning, Regulatory Services and Licensing Committee for approval. The Plan represents the recommendations of the Regulatory Services Manager as to the level of service and scope of work required to meet the statutory obligations placed on the Council.

It should be noted that the service does not have adequate resources in place to undertake the full requirements of the Food and Feed Safety Codes. We therefore adopt as risk based approach focussing resources to areas of highest risk. This approach allows us to focus on high and medium risk activities, service requests, food alerts and incidents where there are suspected or confirmed risks to food safety or health. A key aspect of our work is alternative enforcement where we provide support to low risk businesses to allow them to make the right decisions in how they manage their businesses; and to consumers to allow them to make "informed choices". Examples of the later are the Food Hygiene Information Scheme and the EatSafe Awards which are in place in Argyll and Bute

This approach to managing risk through the effective targeting of resources is wholly appropriate although the risk is that the Food Standards Agency are likely, thorough formal audit, to raise a major non-conformance that the Council do not have significant resources to deliver the Food Safety Code.

3.2 Review

The Service Plan is reviewed annually and otherwise in light of indicated need having regard to many issues including performance standards, service management and auditing; areas identified for improvement and emerging or new demands specific tasks and targets.

4. SERVICE REVIEW – PAST YEAR (2012-13)

4.1 Summary Food Service Plan Review 2012-2013

We have achieved 90% of the service plan and the table in Appendix III illustrates the status against each of the planned activities. Notwithstanding this, it is important to recognise that the service plan does not include reactive workloads which have arisen in the course of the year, which in many cases have taken precedence over some planned activities. Examples include the work associated with enforcement action and the national horsemeat scandal.

Our work against the service plan for 2012-13 is detailed in Appendix XXX, although the main achievements:-

1. The Service has met its targets for programmed workload of 100% for high risk premises and 80% for medium risk premises in respect of food hygiene. We have achieved 100% and 96% respectively
2. We have undertaken a range of alternative enforcement activities which are designed to support businesses who may not be the subject to formal inspection in the course of the year, and to provide more informed advice to consumers. This work has included:
 - Representation at the Food Fare in Oban in February 2013 when we provided a manned display on the implications of the E.coli 1057 cross contamination guidance to food businesses. This allowed us to meet and speak to businesses who were attending the Food Fare on a variety of issues and concerns they had. This has received very positive feedback
 - A survey of B&B establishments in our area seeking information on their operations and also providing general advice across a range of issues including food safety
3. The inspection of new businesses and provision of business advice as required, including working with Business Gateway
4. Our focus on developing our own staff and ensuring competency and currency continues. We have delivered the food training plan and the training of three new EHO's who have been appointed in the last 18 months
5. We have successfully implemented the Food Hygiene Information Scheme to all caterers across Argyll and Bute. Of the 830 premises, 96% had sufficient standards of food hygiene to be issued with a "PASS" certificate.
6. The Service has continued to deliver the service review of Regulatory Services in accordance with corporate standards and identified the required savings target
7. Supporting the economy, as well as generating new income, we have successfully introduced a system of auditing export certificates in relation to products destined for China. This meets the needs of the industry; protects food safety and has generated £3000 of additional income to the Council in the first year.

8. We have supported the economy of Argyll and Bute through our regulatory work and in particular:-
- Increased certification of food exports to 'Third Countries' (i.e. outwith the EU), which is an expanding demand.
 - Successful Participation in a Russian Veterinary Mission, which has opened up the Russian Federation as a new export market for local manufacturers.
 - Introduced a new system of Registration documentation for the local shellfish trade, which will more accurately assure provenance and reduce Food Frauds in this sector thereby securing the international repute of this sector and also protect honest Food Business Operators.
 - The broadly compliant food businesses (i.e. those who have adequate standards of food hygiene and management) have increased from 88% to 91% for food premises risk rated by the service. This indicates increasing standards of food hygiene.
 - Met the requirements of the contract with the FSA to deliver the shellfish monitoring programme enabling us to support the industry and protect food safety for a sector which trades internationally

4.2 There has also been unplanned or reactive work which we have had to respond to and in some cases, the redeploys resources from our planned activities.. These tend to be high priority as they may relate to national alerts; be as a result of the need for formal enforcement action and are necessary to protect food safety and public health. Some examples of this work include:

- Participated in the Veterinary Mission of the Russian Federation
- Participated in the investigations into Horse meat adulteration in meat products, whereby several local manufacturers were ruled out of the issue
- Supported local manufacturing and processing in meeting a significantly increased demand for Approval applications.
- Met significant Service requests from the Council's catering Services, in relation to application of the FSA's Cross Contamination guidance, during an on-going programme of school kitchen refurbishment.
- Represented the Council's interests in the development of the 'New Scottish Food Body', which will replace the FSA in 2014/15.
- Investigated a number of suspected and confirmed cases of foodborne or viral illness associated with food businesses. These have included campylobacter and salmonella infections
- Met significant Service requests from the FSA in relation to resource questionnaires on Food Hygiene, Food Standards and Shellfish as well as Enforcement activity.

4.3 Areas which we did not deliver as planned are detailed below and where appropriate, they are carried forward into the 13-14 service plan

1. We achieved our targets for then planned inspections of high and medium risk premises achieving 100% and 96% accordingly. However, this does not meet the requirements of the Code which requires all planned inspections to be achieved
2. We have a total of 342 unrated food businesses and we have been unable to make significant progress in rating them and bring them into our intervention programme. We believe that many are low risk businesses which do not require formal programmed inspections under the Code, although they require to be rated. This has been raised at FSA Board level and the recent report by Audit Scotland "Protecting Consumers" highlights this failing. A strategy is in place and this will be delivered in 2013.

3. We have not implemented the E.coli strategy and the cross contamination guidance as quickly as we had intended. This work will be a priority between 2013 and 2015.

4.3 Food Monitoring

The focus of the monitoring was on locally produced high risk produce. This includes smoked produce and dairy produce manufactured locally and sold to national and international markets. Formal action, as appropriate, was initiated where the results were unsatisfactory. The table indicates that there was an increase in the quality of the food sampled than in 2012-13 -

FOOD SAMPLES	2010/2011		2011/2012		2012/2013	
	No. Taken	No satisfactory	No. Taken	No satisfactory	No. Taken	No satisfactory
Food – Composition	68	64	21	18	43	40
Food-Microbiological	199	187	65	52	97	93

Shellfish

The shellfish biotoxin and classification of shellfish harvesting areas continues. This work has been funded by the Food Standards Agency Scotland and there is a team of four dedicated staff which has implemented and deliver this programme working in conjunction with the shellfish industry. The work undertaken in 2012-2013 was as follows:-

	Number of sampling sites	Number of samples taken	Number of satisfactory samples
Shellfish Biotoxins	17	692	677
Classification of shellfish waters	44	483	467
<p>Narrative</p> <p>Shellfish is an important sector in the food industry in Argyll and Bute Council. Of the samples taken, 97.4.% met the required standards for biotoxins and water classification. Of the samples which failed to meet the standards, action was taken by the service in conjunction with the harvesters or operators to ensure that the shellfish did not enter the food chain. This resulted in the service of 6 Temporary Closure Notices (biotoxins) and 12 6 voluntary closure agreements. These sites remained closed until standards had been met and the shellfish did not pose a risk to food safety.</p>			

4.4 Food Complaints Investigations

The Service received 67 food related complaints which required action. These complaints range from the sale of out of date food to foreign bodies in food.

4.5 Communicable Disease Investigations/Food Alerts

The Service continued to respond to suspected or confirmed cases of food-borne disease and also to the formal Food Alerts issued by the Food Standards Agency.

4.6 External Audit and Internal Monitoring

No external audits of the service were undertaken in 2012-13 although the Food Standards Agency successfully signed off the Audit Report of 2011 as complete. There were 3 “desk-top” audits undertaken by the FSA in 2012-13 where they sought information and data from local authorities including Argyll and Bute. The results are to be published later in 2013 and the outcomes are as of yet, unknown. We do, however predict that the food standards audit may not be positive, as food standards, both locally and nationally, has historically taken a lower priority than food hygiene. The recent horsemeat incident and concerns regarding traceability are likely to pose a significant change to food safety enforcing authorities in terms of resources and workload. ,

Monitoring against our own internal monitoring plan has been undertaken. This established an inadequate level of compliance. Subsequent monitoring continues to show growing improvement. The internal monitoring procedures have been reviewed and re-invigorated for 2013-14.

4.7 Enforcement Action

The Service seeks to achieve statutory compliance and protect food safety through the ethos of supporting business. In the period 2012-13, this work entailed –

	2010-11	2011-12	2012-13
Total number of visits:-			
Programmed inspections	794	779	726
Other inspections	64	742	616
Revisits	47	44	55
% of premises broadly complaint	90.3%	90.7%	91.6%
Number of Hygiene Improvement Notices served	34	13	12
Number of Hygiene Prohibition Notices served	0	0	0
Number of Remedial Action Notices served	1	3	10
Number of prosecutions	1	0	0

Of note is the increasing trend in the premises which are broadly complaint which indicates good standards of food safety and management in the premises inspected.

5. SERVICE PRIORITIES AND WORKPLAN 2013-14

- 5.1 The service plan details the planned activities and priorities for 2013-14 but cannot identify the reactive work which may arise which may include communicable disease and food related illness, significant enforcement activity; national and local; food withdrawals and emerging issues.

It should be noted that these reactive demands will be assessed based on risk, and adequately resourced. In certain circumstances, this work will be undertaken at the expenses of planned activity

- 5.2 The design of this Service is based on the Council's statutory duties that devolve from Regulation (EC) 882/2004, and the Food Safety Act, 1990, to monitor and ensure minimum standards of food safety within Argyll and Bute. The principal food safety enforcement activity undertaken by the Council is that done by Officers in carrying out planned food hygiene and food standards inspections.

- 5.3 It is the intention to meet the requirements of the Code of Practice for food safety and that low risk premises will be subject to an alternative enforcement strategy. The implications of the E.coli guidance are likely to increase our workload although the implications of this are still to be determined.

Where we have limited resources, we aim to deliver this service plan and to take a risk-based approach focussing resources of the higher risk priorities.

This approach does not, however, meet the requirements of the Framework Agreement and the Food Law Code of Practice from the Food Standards Agency. The targets set by the service for Members approval are:-

- High risk visits 100%
- Medium risk visits 90%
- 70% completion of the alternative enforcement workplan
- 30% of the E.coli 0157 interventions plan (2013-2015)
- Complete the rating of 342 unrated food hygiene

In terms of medium and low risk, these targets may be amended in light of the decision on resources to deliver the E.coli 0157 cross contamination strategy discussed in section 2.7.2

- 5.4 /....

5.4 The priorities for the food service plan for 2013-14, including 5.3 above, are:-

1	Implement an integrated programme, in order to deliver enhanced protection of the Public from pathogenic E.coli including E.coli 0157H relevant to the operating context of Argyll and Bute; applying the FSA's Guidance " <i>E.coli 0157 Control of Cross Contamination Guidance for Food Business Operators and Enforcement Authorities</i> ", in accordance with the E.coli implementation programme.
2.	Undertake the interventions programme for food hygiene, food standards; feed and primary production.
3.	Build upon the work undertaken in 2013, by continuing an investigation into the wider extent of non-compliance and Food Fraud within the wild shellfish sector, with the intention of reporting to the Food Fraud unit of the Food Standards Agency in 2013 and with the intention of developing an operational plan to address none compliance in the ensuing Food Service Plans
4.	Provide advice and support to the management of the Council's various catering operations, in relation to protection of the Councils customers and compliance with the FSA's Cross Contamination Guidance, in relation to the refurbishment of Council kitchens and the central validation of cleaning and disinfection regimes.
5.	Review policies and procedures, in accordance with our plan, to reflect emerging operational realities, new service delivery arrangement and changes to the Food Law Code of Practice or internal service issues
6.	Undertake a ' <i>GAP Analysis</i> ' with the intention of developing a report and recommendations, in relation to the position of the Service in relation to performance on Official Controls for Food Standards and Food Hygiene and the statutory requirements.
7.	Undertake a Training Needs assessment in relation to Food Standards. In order to provide for further authorisation. Provide CPD specific to Food Standards and in particular in relation to Regulation (EU) 1169/2011 on the Provision of Food Information to Consumers, and produce a plan for the authorisation of all Officers within the subsequent Food Service plan 2014/15.
8.	Participate in regional surveys with other local authorities in the West of Scotland Food Liaison Group which are of interest to the nature of our food industry in Argyll and Bute .
9.	Work in partnership, with a major manufacturer of high-risk fishery and shellfish products, of strategic international importance in Food Safety shellfish products of strategic and international importance in terms of Food Safety terms and of significant importance to the local economy
10.	Renegotiate the contract with the FSA and continue to deliver the shellfish monitoring programme , developing working relationships with the sector,
11.	Integrate to produce a comprehensive and overarching 'Farm to Fork' approach to the Enforcement Policies and practices of Food Safety, Food Standards, Feeding stuffs and Primary Production on the basis of scientific Risk Assessment.
12.	Implement document management systems within food safety in accordance with EH document management work plan
13.	Exercise current emergency Outbreak Control Procedures in conjunction with NHS Highland
14.	Implement our alternative enforcement strategy which is aimed at supporting businesses through the provision of advice, and support other than through inspections where it is appropriate to do so. The priorities include a review and improve our policy on support and advice given to New Businesses which will ensure an appropriate visit is undertaken to enable risk assessment to be carried out

19.	Partnership working for Argyll and Bute Working with SEPA, prioritise the published sanitary surveys for the Argyll and Bute, and consider what measures can be taken to address any identified pollutant risks. Working with the Marine Coastal Development unit to integrate Food Safety into Planning and ICMZ activities. Working with Business Gateway
20.	Engage with stakeholders to identify improvements to service delivery
21.	Continued commitment to staff development and workforce planning to ensure a competent and authorised workforce. This will be delivered through our training plan; performance development review and targeted training/mentoring and coaching

5.5 Other service issues

We will continue to:-

- i. Works in partnership with NHS Highland in the investigation of reports of food communicable disease, and more specifically food-borne illness
- ii. Focus our sampling activity on high-risk locally produced goods
- iii. Work with partners including other local authorities, the business sector and the Food Standards Agency
- iv. Provide for an effective and appropriate response to Food Alerts issued by the Food Standards Agency Scotland where all alerts are considered immediately and appropriate action is taken.

6. RESOURCES

6.1 Financial Resources

The table below provides an indication of the Food Safety Law Enforcement budget for 2013-2014 and illustrates an increase of 5%. This excludes the shellfish biotoxin project which is wholly funded through a contract with the FSAS for a further year

Employee costs	375,000
Training & Resource Materials	2000
Transport & Carriage Costs	10000
IT & communications	1,000
Laboratory costs	30,000
 Total Costs	 £418000.00

6.2 Staffing Allocation

All Enforcement Officers hold the qualifications described in the Food Safety Codes of Practice for Food Safety; Food Standards and Feed under the Council's Scheme of Delegation. The Service has an established procedure for the Authorisation of Enforcement Officers and Appendix III details the specific authorisations for Officers. These fall to be reviewed on a regular basis depending, and may change in the course of the period of the Service Plan.

6.3 Staff Development Plan

The Council operates a Performance Development and Review scheme, designed to identify and progress training and development opportunities for its employees. To maintain the currency and competency of authorised officers, we meet the requirements within the COP in relation to Food specific CPD (minimum of 10 hours annually)

7. MANAGEMENT

7.1 Quality Management

The Regulatory Services service is committed to the provision of a quality service founded upon policies, procedures, performance management and auditing.

8. SUMMARY

8.1 Targets for Year 2013-2014

The targets are.

1. The Service aims to meet the following inspection targets for food hygiene and food standards
 - High risk visits 100%
 - Medium risk visits 90%
 - 70% completion of the alternative enforcement work plan
 - 30% of the E.coli 0157 interventions
 - Complete the rating of 342 unrated food hygiene

2. The Service will respond to 100% reported food complaints.

3. The Service will undertake to investigate 100% cases of infectious disease as notified by the Consultant in Public Health Medicine and any other suspected cases where food safety or the public may be at risk

4. The Service will meet 80% of its sampling programme

5. The Service will respond to 100% “for action” Food Alerts

6. Respond to 90% of service requests within 20 working days

**REGULATORY SERVICES
SERVICE CONTACT ARRANGEMENTS**

Contact arrangements and details

The Environmental Health service is accessible at offices of the Council located in all larger towns within the Council area. Service requests can be initiated by telephone, fax, video conference, e-mail or in person. The various office locations are as follows:

Offices where environmental health staff are based

EAST	Dunoon Service Point, Hill Street, Dunoon
	Blairvadach, Shandon, Helensburgh
	Eaglesham House, Mount Pleasant Road, Rothesay
WEST	Municipal Buildings, Albany Street, Oban
	Area Office, Manse Brae, Lochgilphead

All environmental health services can be contacted by telephone on **01546 605519**.

Environmental health staff can also be seen by appointment at any location within Argyll and Bute or at the Council's other customer service points:

Islay Service Point, Jamieson Street, **Bowmore**, Isle of Islay, PA43 7HL

Campbeltown Service Point, Burnet Building, St John Street, **Campbeltown**, PA28 6BJ

Mull Service Point, Breadalbane Street, **Tobermory**, Isle of Mull, PA72 6NZ

Tiree Service Point, The Business Centre, **Crossapol**, Isle of Tiree, PA77 6UP

Colonsay Service Point, **Scalasaig**, Isle of Colonsay, PA61 7YW

Jura Service Point, Schoolhouse, **Craighouse**, Isle of Jura, PA60 7XG

Regulatory Services management can be contacted at Kilmory, **Lochgilphead**, PA31 8RT, telephone 01546 605519, fax 01546 604410.

The service can be contacted by email at env.health@argyll-bute.gov.uk.

Advice and information on occupational health and safety is published on the Council's website www.argyll-bute.gov.uk.

FORMAL AUTHORISATIONS AND APPOINTMENTS

PUBLIC ANALYST, FOOD EXAMINERS, AGRICULTURAL ANALYSTS

In terms of the Food Safety (Sampling and Qualifications) Regulations 1990, the following staff members hold the Mastership in Chemical Analysis qualifications awarded by the Royal Society of Chemistry and are eligible for appointment as Public Analysts:

Gary Walker	Scientific Services Manager
Jane White	Public Analyst

Food Examiners

In terms of the Food Safety (Sampling and Qualifications) Regulations 1990, the following staff members hold academic qualifications listed in Part 1 of Schedule 2 and have attained the minimum three year experience requirement in the laboratory listed in Part II of the Schedule:

Gary Walker	Scientific Services Manager
Jane White	Public Analyst
Karen Platt	Microbiologist
Dawn Neeson	Microbiologist
Alison Laird	Microbiologist

Agricultural Analyst

Under the terms of the Feeding Stuffs (Sampling and Analysis) Regulations 1999, the following staff members, holding the Mastership in Chemical Analysis awarded by the Royal Society of Chemistry and whose practical experience as agricultural analyst, has been attested, are eligible for appointment as Agricultural Analyst or Deputy Agricultural Analyst.

Gary Walker	(Agricultural Analyst) Scientific Services Manager
Jane White	(Deputy Agricultural Analyst) Public Analyst

Continuing Professional Competence

For information. In keeping with the requirement that these appointees meet all relevant legal requirements and Food Safety Act Codes of Practice shall be satisfied, the Scientific Services Manager, Gary Walker, reports that the following holders of the Mastership in Chemical Analysis qualification have successfully satisfied the audits of the scheme operated by the Association of Public Analysts during the calendar year to December 2010.

Gary Walker	Scientific Services Manager
Jane White	Public Analyst

ARGYLL AND BUTE COUNCILS AUTHORISED OFFICERS UNDER FOOD SAFETY ACT 1990

The following Officers are appointed under the Food Safety Act 1990 as “authorised food officer”. Their powers of authorisation vary depending upon qualifications, experience, post and competency. The undernoted details the specific authorisation levels for Authorised Officers.

Food Hygiene and Food Standards

Powers		Visit, access and inspection		Sampling		Seizure and detention		Service of Hygiene Improvement Notice		Service of Temporary Closure Notice		Service of Remedial Action Notice		Service of Emergency Prohibition Notice		Approval of Businesses Regulation (EC) 853/2004
		Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene		Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	
Alan Morrison	Regulatory Services Manager	√	√	√	√	√	√							√	√	
Andy MacLeod	Lead Officer Food Control	√	√	√	√	√	√	√		√	√		√	√	√	√
Jo Rains	– Environmental Health Manager	√	√	√	√	√	√	√		√	√					
Jim Rennie	Environmental Health Officer	√	√	√	√	√	√	√		√	√					
Richard Gorman	Environmental Health Officer	√	√	√	√	√	√	√		√	√		√			
Jacqui Middleton	Environmental Health Officer	√	√	√	√											

Powers		Visit, access and inspection		Sampling		Seizure and detention		Service of Hygiene Improvement Notice		Service of Temporary Closure Notice		Service of Remedial Action Notice		Service of Emergency Prohibition Notice	
		Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	Standards
Christine McLachlan	Regulatory Services Officer	√	√	√	√					√					
Marci Gillan	Regulatory Services Officer	√	√	√		√	√	√		√					
Mary Watt	Environmental Health Officer	√	√	√	√	√	√	√	√	√		√			
Dave Chapman	Regulatory Services Officer	√	√	√	√	√	√	√		√					
Patrick Mackie	Environmental Health Officer	√	√	√	√	√	√	√	√	√					
Andrew Hill	Environmental Health Officer	√	√	√	√	√	√	√*	√*	√*					
Paula Monaghan	Environmental Health Officer	√	√	√	√			√	√	√					
Ailleachd Vernon	Environmental Health Officer	√	√	√	√			√	√	√					
Wendy Lilico	Environmental Health Officer	√	√	√	√	√	√	√	√	√		√			
Iain MacKinnon	Environmental Health Manager – West	√	√	√	√	√	√	√	√	√					

Powers		Visit, access and inspection		Sampling		Seizure and detention		Service of Hygiene Improvement Notice		Service of Temporary Closure Notice		Service of Remedial Action Notice		Service of Emergency Prohibition Notice	
		Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	Standards	Hygiene	Standards
Paul Reynolds	Environmental Health Officer	√	√	√	√	√	√	√	√	√		√			
Sue Stefek	Environmental Health Officer	√	√	√	√	√	√	√	√	√					
Karen MacLeod	Regulatory Services Officer	√	√	√	√	√	√	√		√		√			
Ian Campbell	Technical Officer	√	√	√	√										
Willie Macquarrie	Shellfish Sampling Officer	√	√	√	√										
Ewan McDougall	Shellfish Sampling Officer	√	√	√	√										
Allison Hardie	Shellfish Sampling Officer														
Karen Goodchild	Technical Officer	√	√	√	√										
David Kerr	Senior Animal Health and Welfare Officer	√	√	√	√										
William Young	Animal Health and Welfare Officer	√	√	√	√										

Authorised Feed Officers

Powers		Level of Authorisation	
		Level 1	Level 2
Lee Roberts	Trading Standards Manager	√	
Colin Sutcliffe	Trading Standards Officer (Fraud and Service Support)	√	
Matthew Corns	Trading Standards Officer		√
Kathleen Munro	Trading Standards Officer		√
James Howard	Trading Standards Officer		√
Francis McNutt	Trading Standards Officer		√
Val Turnbull	Regulatory Services Officer		√
Louise Potter	Regulatory Services' Officer		√

APPENDIX III

Assessment of actions against priorities in 2012-13 Service Plan

Activity	Achieved 2012-13
<p>Implement an integrated programme, in order to deliver enhanced protection of the Public from pathogenic E.coli including E.coli 0157H relevant to the operating context of Argyll and Bute; applying the FSA's Guidance "<i>E.coli 0157 Control of Cross Contamination Guidance for Food Business Operators and Enforcement Authorities</i>", embracing fresh produce production and private water supplies that serve food businesses..</p>	<p>Preparation phase completed. Overarching E. coli plan completed with completion of operational plans addressing sub components, i.e. operational plans addressing Butchers shops, caterers and retailers, PWS and fresh produce production. 2 days of Officer CPD, development of Enforcement Policies and inspection guidance. Implementation on a triaged and phased basis over 3 years beginning June 2013.</p>
<p>2. Undertake the interventions programme for food hygiene, food standards and primary productions, with the target of 100% of high-risk premises and undertake Official Controls within the Broadly Complaint and medium Risk sectors according the Interventions Strategy</p>	<p>Completed</p>
<p>3. In relation to the High-risk manufacturing and Processing sectors. Develop an operational plan in order to deliver the Service's duties and objectives and establish a working Group to provide ongoing support for Officers delivering Official Controls in the sector</p>	<p>Completed.</p>
<p>4. In relation to the Butchers shops sector, develop an operational plan in order to operationally deliver the E. coli Strategy and establish a working Group to provide ongoing support for Officers delivering Official Controls in the sector..</p>	<p>Completed</p>
<p>5. In relation to the fresh produce sector, develop an operational plan in order to operationally deliver the E. coli Strategy and establish a working Group to provide ongoing support for Officers delivering Official Controls in the sector</p>	<p>Completed</p>
<p>6. Build upon the work undertaken in 2011, by continuing an investigation into the wider extent of non-compliance and Food Fraud within the wild shellfish sector, with the intention of reporting to the Food Fraud unit of the Food Standards Agency in 2013 and with the intention of developing an operational plan to address none compliance in the ensuing Food Service Plans</p>	<p>Deferred at the request of the FSA due to demands created by the wider horsemeat adulteration issue. In addition, resourcing considerations required this operational plan to be deferred one year behind the E.coli plan. Despite this situation considerable progress has been made in joint working with Glasgow and North Ayrshire Councils, leading to the closure of two unapproved depuration establishments and the interception of a</p>

	number of illegal shellfish supplies and in relation to a new system of provenance certification and monitoring.
7. Review policies and procedures to reflect emerging operational realities, new service delivery arrangement and changes to the Food Law Code of Practice or internal service issues	Enforcement policies reviewed and updated. Inspection procedure updated to codify the Best Practice verified by the FSA Focussed Audit of 2011.
8. Provide for the authorisation of all officers in relation to the Service of Remedial Action Notices within food businesses subject to Regulation EC (852) 2004.	Progress has been made with three newly qualified Officers: - With one Officers being authorised up to category B, two Officers gaining HACCP and Lead Auditor certification, .
9. Undertake research to determine the impact in Argyll and Bute of Regulation (EU) 1169/2011 on the Provision of Food Information to Consumers, and produce a plan for the authorisation of all Officers within the subsequent Food Service plan. of 2013	Completed.
10. Meet the requirements of the contract with the FSA and continue to deliver the shellfish monitoring programme , developing working relationships with the sector,	Completed
11. Integrate to produce a comprehensive and overarching 'Farm to Fork' approach to the Enforcement Policies and practices of Food Safety, Food Standards, Feeding stuffs and Primary Production on the basis of scientific Risk Assessment.	Delayed, pending the announcement of the establishment of a New Central Competent Body for Scotland and the Review of the Delivery of Official Controls, which will influence how Feeding Stuffs Official Controls are delivered in future.
12. Introduce measures to provide and support a mobile workforce in environmental health and documented management systems	The assessment of mobile working solutions has been overtaken by the improvements in the Councils ICT systems, including LYNC and workforce deployment programme. The drive to mobile working will also be assisted by the implementation of the electronic document management system
13. Exercise current emergency Outbreak Control Procedures in conjunction with NHS Highland	Not Delivered but participated in HPS/local authorities E.coli 0157 outbreak control exercise
14. Implement our alternative enforcement strategy which is aimed at supporting businesses through the provision of advice, and support other than through inspections where it is appropriate to do so.	Progress made
15. Partnership working for Argyll and Bute Working with SEPA, prioritise the published sanitary surveys for the Argyll and Bute, and consider what measures can be taken to address any identified	Completed. Sanitary Surveys intergraded into inspection procedure with requirement to liaise with SEPA as required. Close working relationship with the Marine Coastal Development unit established.

<p>pollutant risks. Working with the Marine Coastal Development unit to integrate Food Safety into Planning and ICMZ activities. Working with Business Gateway</p>	
<p>16 Engage with stakeholders to identify improvements to service delivery</p>	<p>Delivered through customer surveys and regular meetings with FSA</p>
<p>17. Ongoing commitment to staff training to ensure a competent and authorised workforce.</p>	<p>Completed. Statutory CPD targets exceeded.</p>
<p>18. Provide for the authorisation of all officers in relation to the Service of Remedial Action Notices within food businesses subject to Regulation EC (852) 2004</p>	<p>Completed.</p>

FEED STRATEGY

Argyll and Bute Council Official Feed Controls Service Plan 2013/14

1.	Service Aims and Objectives
1.1 Aims and Objectives	<p>The aims of Argyll and Bute Council's Regulatory Services in relation to Feed Control are to improve the hygiene standards of feed businesses , thus protecting animal and food safety, by achieving a year on year increase in the number of broadly compliant premises :</p> <p>This aim can be achieved by meeting the following objectives</p> <ul style="list-style-type: none"> • To work with local businesses in an open and transparent manner to help them to comply with relevant feed legislation • To ensure that hygiene and quality standards of feed businesses meet statutory requirements. • To support and improve feed quality through a programme of inspections and support to business. • To continue to provide advice and guidance on all feed safety matters to Argyll and Bute businesses. • To ensure the safety and compliance of feeding stuffs in Argyll and Bute is in line with the Code of Practice to reduce the risk arising to animal and human health. • To respond efficiently to complaints about feed quality, feed premises, feed labelling or feed composition, originating from premises or purchases made within Argyll and Bute. • To play a full role in the West of Scotland Quality Liaison Group and to co-operate in full with all relevant agencies, including the Food Standards Agency Scotland to improve consistency and best practice in the role of feed enforcement among Scottish local authorities.
1.2 Links to corporate objectives and plans	<p>This plan links to the wider Council Corporate policies and the Single Outcome Agreement through contributing to the following wellbeing outcomes from the Regulatory Services Balanced Scorecard</p> <ul style="list-style-type: none"> • Supporting our Economy – through advice and assistance to new and existing business • Protecting the Vulnerable – both in terms of preventing deleterious ingredients entering the human food chain and in terms of animal welfare • Meeting our statutory functions – specific regulatory duties are imposed upon us as the official feed authority
2.	Background
2.1 Profile of the Local Authority	<p>Argyll and Bute's population of 89,200 is spread across the second largest local authority area in Scotland. Our area has the third sparsest population density of the 32 Scottish local authorities, with an average population density of just 0.13 persons per hectare.</p> <p>The council area is bounded by the urban areas of Helensburgh and Dunoon along the Clyde, Loch Lomond to the East, the Mull of</p>

	<p>Kintyre to the south, Atlantic Islands to the west, and the Sound of Mull and Appin to the north</p> <p>Seventeen per cent of Argyll and Bute’s population live on Islands. Forty-five per cent live in settlements of 3,000 or more people; conversely, 55 per cent of Argyll and Bute’s population live in settlements smaller than 3,000 people, or outwith settlements altogether. Eighty per cent of Argyll and Bute’s population live within one kilometre of the coast.</p> <p>Argyll and Bute has 25 inhabited islands, including Bute, Islay, Jura, Mull, Iona, Coll and Tiree, more than any other local authority in Scotland. The area is also home to Loch Awe (at 41 kilometres, the longest freshwater body in Britain) and several long sea lochs, which bisect the landscape. The physical geography of the area has limited development of the road network in the area, and leads to high levels of reliance on ferries for travel.</p> <p>52% of Argyll and Bute’s population live in areas classified by the Scottish Government as ‘rural’ 45% of Argyll and Bute’s population live in areas classified as ‘remote rural’; 7% live in areas classified as ‘accessible rural’.</p>								
<p>2.2 Organisational Structure</p>	<p>Regulatory Services is a unit located within Planning and Regulatory Services, which in turn is located within the Development and Infrastructure Department of Argyll & Bute Council.</p> <p>Regulatory Services comprises three distinct professional services. These services are Animal Health, Environmental Health and Trading Standards.</p> <p>The work of Regulatory Services can be directed to the Council’s Executive Committee or the Planning, Regulatory Services and Licensing Committee, as determined by the nature of the report. In addition, the Service has access to the Area Committees and the Argyll and Bute Licensing Boards.</p> <p>A Service Level Agreement has been entered into between ourselves and Glasgow City Council Scientific Services to provide specialist examination services. This agreement includes Agricultural Analyst services</p> <p>The organisational management structure (as at 1st April 2013) is set out in the table below:</p> <table border="1" data-bbox="475 1921 1353 2045"> <tr> <td>Chief Executive</td> <td>Sally Loudon</td> </tr> <tr> <td></td> <td> </td> </tr> <tr> <td>Executive Director</td> <td>Sandy Mactaggart</td> </tr> <tr> <td></td> <td> </td> </tr> </table>	Chief Executive	Sally Loudon			Executive Director	Sandy Mactaggart		
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	<table border="1"> <tr> <td>Head of Planning and Regulatory Services</td> <td>Angus Gilmour</td> </tr> <tr> <td>Regulatory Services Manager</td> <td>Alan Morrison</td> </tr> <tr> <td>Trading Standards Manager (Lead Food Officer)</td> <td>Lee Roberts</td> </tr> </table>	Head of Planning and Regulatory Services	Angus Gilmour	Regulatory Services Manager	Alan Morrison	Trading Standards Manager (Lead Food Officer)	Lee Roberts
Head of Planning and Regulatory Services	Angus Gilmour						
Regulatory Services Manager	Alan Morrison						
Trading Standards Manager (Lead Food Officer)	Lee Roberts						
2.3 Scope of the Feed Service	<p>The Regulatory Services Team is responsible for delivering all aspects of feed enforcement within Argyll and Bute.</p> <p>Normally, duties are split as follows:</p> <ul style="list-style-type: none"> • Animal Health – primary production inspections (including feed) • Trading Standards - feed hygiene, feed standards and control, feed sampling <p>Feed duties are often carried out in conjunction with other enforcement work. This may include (but is not limited to) Animal Health and Welfare, Consumer Safety, Fair Trading, Metrology and Other Trading Standards Quality enforcement.</p> <p>The Animal Health enforcement team is made up of 3 officers. The Trading Standards enforcement team is made up of 8 officers. The FTE staffing allocated to feed duties is set out in section 4.2</p>						
2.4 Demands on the Feed Service	<p>There are currently an estimated 2347 premises within Argyll and Bute which may be subject to feed enforcement (1st April 2013).</p> <p>These premises have been subject to a desktop risk rating exercise, but have not all received a risk rating visit at this time. Current staffing levels limit the number of feed visits that may be undertaken in a year. Accordingly, we are verifying the low risk status of premises as we carry out the programmed inspections as opposed to pro-actively checking the risk status in advance.</p> <p>The vast majority of premises are farms, but there are other businesses of various types and sizes</p> <p>These include</p> <ul style="list-style-type: none"> • 14 Fish Farms • 6 Producers of Co products of the Food Industry (retailers) • 14 Producers of Co products of the Food Industry (whisky distilleries) • 8 Feed Transporters. <p>All premises are subject to registration. There are no approved premises within Argyll & Bute</p> <p>The feed service is delivered from our Headquarters in Lochgilphead and from 4 decentralised offices throughout the county. These offices operate during normal working hours (0900-1700) Monday to Friday. Some smaller offices may close for an</p>						

	<p>hour at lunchtime.</p> <table border="1"> <tr> <td>Headquarters</td> <td>Kilmory, Lochgilphead PA31 8RT</td> </tr> <tr> <td>Bute and Cowal</td> <td>22 Hill Street, Dunoon PA23 7AP</td> </tr> <tr> <td>Helensburgh and Lomond</td> <td>Blairvadach, Shandon, by Helensburgh G84 8ND</td> </tr> <tr> <td>Mid Argyll, Kintyre and Islay</td> <td>Area Office, Wee Manse Brae, Lochgilphead PA31 8QU</td> </tr> <tr> <td>Oban, Lorn and the Isles</td> <td>Municipal Buildings, Albany Street, Oban PA34 4AW</td> </tr> </table> <p>In the event of a feed related emergency, members of the Regulatory Services Management Team are contactable out of hours.</p> <p>There are no significant additional external factors impacting on the service. The percentage of business owners whose first language is not English is considered to be less than than average. The number of manufacturers is small and, although Argyll and Bute has many fishing ports, no feed is currently imported.</p> <p>Possibly the most significant factor which could affect the authority's ability to deliver the feed control programme is the relatively small size of the service. This means that a large outbreak or event could have a disproportionate effect on the service. There is, however, an agreement between the authorities constituting the Strathclyde Emergency Co-ordinating Group (SECG) to provide mutual aid which should mitigate the effects of any such event.</p>	Headquarters	Kilmory, Lochgilphead PA31 8RT	Bute and Cowal	22 Hill Street, Dunoon PA23 7AP	Helensburgh and Lomond	Blairvadach, Shandon, by Helensburgh G84 8ND	Mid Argyll, Kintyre and Islay	Area Office, Wee Manse Brae, Lochgilphead PA31 8QU	Oban, Lorn and the Isles	Municipal Buildings, Albany Street, Oban PA34 4AW
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Oban, Lorn and the Isles	Municipal Buildings, Albany Street, Oban PA34 4AW										
2.5 Regulation Policy	<p>The enforcement policy adopted by Regulatory Services is one of risk based proportionate regulation, where we seek to work with business and others to achieve compliance. In instances where there is a significant non- conformance, risk to public health or safety or a history of non-compliance by a business, formal action will be taken.</p> <p>Argyll and Bute Council follow the guidance set out in the Feed Law Enforcement Code of Practice (Great Britain) http://www.food.gov.uk/multimedia/pdfs/feedcodeofpractice.pdf</p>										
3.											
3.1 Interventions at Feeding stuffs establishments	<p>Primary Production Feed enforcement is carried out in accordance with the Food Law Code of Practice, the enforcement regime as detailed in Annex 10 of the Food Law code of Practice.</p> <p>Primary Production Inspections of Feedingstuffs establishments operating as livestock farms are carried out by authorised Animal Health Officers on behalf of Trading Standards or by Trading Standards Officers. As these are the only planned inspections carried out on Farms with regard to Primary production of feed, Animal Health Officers are required to check on each inspection if</p>										

	<p>the farm is registered with the Authority under the Feed Hygiene Regulations 2005 and identify issues relating to feed storage and usage.</p> <p>If the farm is not registered the officer should complete the Model application document with the Feed Business operator, determining the appropriate Registration or approval code. Completed Registration/Approval forms should be forwarded to the Trading Standards Officer in the appropriate area office to assign a registration number for the farm. The Trading Standards Officer should confirm new or existing registration numbers in writing to the feed Business Operator within 14 days.</p> <p>Feed Hygiene Inspections of Feed Business Establishments are carried out at a frequency determined by scoring the feedingstuffs establishment against the Animal Feed Law Inspection Rating Scheme contained in ANNEX 5 of the Feed Law Enforcement Code of Practice. It is assumed that all livestock farms and fish farms are rated as category C premises with a minimum inspection frequency of every 60 months. Category C Inspections are undertaken through alternative enforcement.</p> <p>All producers of co products of the food industry and feed transporters are currently rated category B and are inspected every 24 months.</p> <p>Argyll and Bute has a large number of livestock farms. We estimate that there are 2305 farms that may be subject to registration or approval..</p> <p>Currently we have received registration documents from</p> <ul style="list-style-type: none"> • 684 Farms • 14 Fish Farms • 6 Producers of Co products of the Food Industry (retailers) • 14 Producers of Co products of the Food Industry (whisky distilleries) • 8 Feed Transporters <p>The additional Livestock farms that are not registered are anticipated to be low risk although they will be added to our Feed Hygiene Register. We intend to contact these premises by letter during 2013/14 in order to obtain completed Registration forms.</p> <p>They will also be asked to provide details of any feed produced and details of any processes the feed is put through. This will enable us to confirm the Feed Business is rated correctly against the Animal Feed Law Inspection Rating Scheme.</p> <p>If the Feed Business is carrying out any of the activities that would fall within the scope of ANNEX 11 of regulation (EC) No 183/2005 the Business must implement procedures based on HACCP. They would require to be inspected by an authorised Trading Standards Officer trained to Level 2</p> <p>The plan for 2013/14 is as follows</p>
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	<table border="1"> <thead> <tr> <th></th> <th>No of premises</th> <th>Planned activity in 13-14</th> </tr> </thead> <tbody> <tr> <td>High risk</td> <td>0</td> <td>0</td> </tr> <tr> <td>Medium risk</td> <td>28</td> <td>8 feed visits to Feed Transporters. Visits will also be scheduled to at least 6 retailers/distilleries</td> </tr> <tr> <td>Low risk</td> <td>2305 (estimate)</td> <td>48 primary production visits</td> </tr> </tbody> </table> <p>(a) Trading Standards enforcement staff to carry out 8 Primary Production/Feed Hygiene inspections at Transporters of feed materials produced in Argyll who are registered under the Feed Hygiene Regulations 2005.</p> <p>(b) Trading Standards will also carry out at least 6 visits to premises producing co-products of the food industry</p> <p>(c) 10 Integrated Primary Production visits to livestock farms for the purposes of animal health and welfare, during these visits, food and feed hygiene are considered as an integral part of the inspection. These will be undertaken by Animal Health and Welfare Officers authorised in terms of animal health and welfare, food safety and feed.</p> <p>(d) A further 38 Primary Production visits will be allocated to AH/TS staff dependant on workload & the proposed sampling programme</p> <p>(e) To undertake a sampling programme. We are currently awaiting further information from the FSA to enable us to set this programme</p> <p>(f) To risk assess the businesses which are currently deemed to be low risk but require formal rating under the Code</p> <p>(g) We will pursue the potential for integration of this work across Regulatory Services</p>		No of premises	Planned activity in 13-14	High risk	0	0	Medium risk	28	8 feed visits to Feed Transporters. Visits will also be scheduled to at least 6 retailers/distilleries	Low risk	2305 (estimate)	48 primary production visits
	No of premises	Planned activity in 13-14											
High risk	0	0											
Medium risk	28	8 feed visits to Feed Transporters. Visits will also be scheduled to at least 6 retailers/distilleries											
Low risk	2305 (estimate)	48 primary production visits											
3.2 Feed Complaints	<p>Complaints about feed are investigated in accordance with the current Trading Standards complaints procedure.</p> <p>The service has received 1 complaint relating to Feedstuffs (excluding pet foods) during the last 5 years. In addition, over the same period, we have received 3 complaints relating to pet foods.</p> <p>Due to this low complaint frequency, no formal estimate has been made as to the likely demands upon the service resulting from complaints</p>												
3.3 Home Authority Principle and Primary Authority Scheme	<p>Trading Standards in Argyll and Bute currently do not have any Home Authority or Primary Authority arrangements in place with any Feed Businesses.</p> <p>Obviously, should any business wish to develop such a relationship, we would be pleased to set up the necessary</p>												

	<p>arrangements.</p> <p>Trading Standards staff should not contact businesses based outside Argyll without first checking if a Home Authority or Primary Authority relationship exists between the business and another Trading Standards department. All authorised feed officers have access to the TS Interlink database which is maintained by the Trading Standards Institute and contains details of Home Authority agreements in the UK. Officers also have access to the LBRO website which contains the details of all Primary Authority arrangements in the UK.</p>
3.4 Advice to Business	<p>Advice to businesses regarding feed is normally allocated to the Trading Standards Officer in the area where the business is located. In complex cases, the enquiry will be allocated to a Level 2 qualified officer.</p> <p>Our service procedures set a target of 90% for completing all Business Advice Requests within 14 days.</p> <p>During the previous 5 years, we have received 64 requests for Business Advice. These have mainly related to the registration procedure.</p>
3.5 Feed Sampling	<p>The Council has appointed Glasgow Scientific Services as its Public Analyst, Agricultural Analyst and Food Examiner to provide analysis and advice in relation to food and feeding stuff samples and food complaints</p> <p>Feed Sampling and inspections are carried out by authorised officers of the Council, in compliance with relevant Codes of Practice. Formal sampling may only be carried out by an officer properly authorised under the Agriculture Act 1970.</p> <p>Trading Standards intend to take part in at least 50% of projects planned annually by the West Of Scotland Quality Group.</p> <p>Our own feed sampling plan is currently awaiting further information and guidance from the FSA. This information is expected to be issued in early May 2013.</p> <p>Feed Analysis is generally carried out by Glasgow Scientific Services, a UKAS accredited laboratory, but certain specialised analysis may be carried out by other specialist laboratories</p>
3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease	<p>There are established procedures and plans in place to respond to any incident relating to public health or food safety. These plans, which include the Foodborne Outbreak Plan, The Public Health Incident Plan and the Generic Animal Health and Welfare Contingency Plan, outline the arrangements, including roles and responsibilities, when dealing with an incident. These are multi-agency plans involving NHS Highland, Food Standards Agency and other agencies.</p> <p>There are also mutual support arrangements in place with neighbouring local authorities through the Strathclyde Emergencies</p>

	Coordinating Group (SECG)												
3.7 Feed Safety Incidents	<p>Argyll and Bute Trading Standards are part of an electronic alert system operated by Food Standards Agency Scotland. Contact can be made with the Regulatory Services Manager on a 24 hour basis.</p> <p>The feed alert will then be forwarded to the Lead Feed Officer to direct appropriate action to be taken by the feed team.</p> <p>Written procedures are set out in our Food Alerts procedure.</p> <p>The Feed Team will use the Feed Incident Flow Diagram (ANNEX 3 of the Feed Law Enforcement Code of Practice) to determine the action to be taken on identifying a feed incident which has taken place within Argyll and Bute. If the Food Standards Agency (FSA) is required to be notified of a feed incident the investigating officer will complete a Feed Incident Report Form and forward it to the FSA as soon as possible.</p>												
3.8 Liaison with Other Organisations	<p>There is an integrated approach for food, feed and animal health which is achieved through the service being managed by the Regulatory Services Manager, with responsibility for environmental health, trading standards and animal health and welfare.</p> <p>The Regulatory Services Manager and Trading Standards Manager liaise with other authorities through participation in SCOTSS (Society of Chief Officers of Trading Standards in Scotland).</p> <p>A nominated Trading Standards Officer attends the West of Scotland Quality Group (a sub-group of SCOTSS) whose focus is Feed and Fertiliser enforcement.</p>												
3.9 Feed Safety and Standards promotional work, and other non-official controls interventions	<p>The information contained within the Argyll and Bute Council website for Feed Businesses will be developed during 2013/14.</p> <p>A working group of feed, food and animal health enforcement staff has been tasked to develop a Primary Production work plan for 2013/14.</p>												
4.	Resources												
4.1 Financial Allocation	<p>Present staffing attached to Feeding Stuffs is as follows [Full Time Equivalent]:-</p> <table border="1" data-bbox="539 1688 1289 1977"> <thead> <tr> <th>Staff</th> <th>Nos. (FTE) 2011</th> </tr> </thead> <tbody> <tr> <td>Regulatory Services Manager</td> <td>0.001</td> </tr> <tr> <td>Trading Standards Manager</td> <td>0.005</td> </tr> <tr> <td>Trading Standards Officers</td> <td>0.5</td> </tr> <tr> <td>Animal Health Officers</td> <td>0.005</td> </tr> <tr> <td>TOTAL</td> <td>0.5011</td> </tr> </tbody> </table> <p>Staffing Costs for 2013/14 – £15000</p>	Staff	Nos. (FTE) 2011	Regulatory Services Manager	0.001	Trading Standards Manager	0.005	Trading Standards Officers	0.5	Animal Health Officers	0.005	TOTAL	0.5011
Staff	Nos. (FTE) 2011												
Regulatory Services Manager	0.001												
Trading Standards Manager	0.005												
Trading Standards Officers	0.5												
Animal Health Officers	0.005												
TOTAL	0.5011												

	<p>Given the financial position with the Council, there will be no growth in the budget and this will remain at the levels specified above. Accordingly, we will require to continue to have a risk-based focus to feed hygiene, standards and primary production</p>																								
<p>4.2 Staffing Allocation</p>	<p>All our enforcement officers are generalists and our time management system does not allow us to accurately record the precise time each officer spends on feeding stuffs. It is estimated that the total time spent upon enforcement by all the officers is 0.5 FTE.</p> <p>Currently, 11 officers are authorised to enforce feed legislation. Levels of authorisation and enforcement powers vary according to qualification</p> <table border="1" data-bbox="475 678 1347 1395"> <thead> <tr> <th><i>Training Level</i></th> <th><i>Number of Officers</i></th> <th><i>Authorisation Level</i></th> <th><i>Total FTE on Feed Work</i></th> </tr> </thead> <tbody> <tr> <td>Level 2</td> <td>2</td> <td>Inspect, take formal samples, instigate formal enforcement activity</td> <td>0.09</td> </tr> <tr> <td>Level 1</td> <td>3</td> <td>As above</td> <td>0.12</td> </tr> <tr> <td>Internal training - Sampling & Inspections</td> <td>3 (1 has also undertaken some external FSA training)</td> <td>1 as above 2 can inspect and take informal samples only</td> <td>0.17</td> </tr> <tr> <td>Internal Training - Primary Production Inspections only</td> <td>3</td> <td>Power to inspect only</td> <td>0.12</td> </tr> <tr> <td>TOTAL</td> <td>11</td> <td></td> <td>0.5</td> </tr> </tbody> </table> <p>In addition, it is estimated that a further 0.1 FTE is provided in unqualified administration and clerical support.</p>	<i>Training Level</i>	<i>Number of Officers</i>	<i>Authorisation Level</i>	<i>Total FTE on Feed Work</i>	Level 2	2	Inspect, take formal samples, instigate formal enforcement activity	0.09	Level 1	3	As above	0.12	Internal training - Sampling & Inspections	3 (1 has also undertaken some external FSA training)	1 as above 2 can inspect and take informal samples only	0.17	Internal Training - Primary Production Inspections only	3	Power to inspect only	0.12	TOTAL	11		0.5
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TOTAL	11		0.5																						
<p>4.3 Staff Development Plan</p>	<p>All staff members attend external events for CPD as far as availability allows. Being a relatively small service, staff CPD in feed enforcement can largely be gained through a combination of FSA low cost training events and internal staff development e.g. consistency exercises. Full records are kept of staff training and these are reviewed regularly to ensure that staff with a need to attend particular courses (e.g. FSA HACCP auditing etc.) are identified and given preference when places become available.</p> <p>There is a training and development programme in place through the Corporate Personal Development Review scheme which is to be replaced with a competency based Performance Review Development. As part of this, training needs are considered across all activities including feed.</p>																								
<p>5.</p>																									

5.1 Quality assessment and internal monitoring	<p>As a small authority, the use of a formal quality system is considered to require a disproportionate amount of officer time and expense to achieve any benefit.</p> <p>On occasion, the Lead Feed Officer will accompany authorised staff during enforcement work to ensure standard procedures are followed.</p> <p>Internal training is carried out as required, and newly trained officers are initially accompanied by more experienced officers during visits.</p> <p>Records of all relevant training courses attended (internal & external) are maintained</p>
6,	
6.1 Review against the Service Plan	<p>The Trading Standards Manager reports regularly to the Regulatory Services Manager and the Management team which integrates environmental health, trading standards and animal health. Part of that report includes an on-going review of the Trading Standards Service Plan and will include all references to feed enforcement within the plan.</p>
6.2 Identification of any Variation from the Service Plan	<p>The reporting arrangements set out above use a “traffic light” system to identify any areas causing concern. Any identified variance will be flagged in red and will either be corrected or a full written explanation for the variance provided.</p>
6.3 Areas of Improvement	<p>Where a review of the service plan highlights an area for improvement, this will be incorporated in the plan for the following year.</p>

Appendix 1

Inspections 2013-14

These come under a number of headings as below:-

Primary Production - Each year a list of premises is sent to the FSA outlining the Inspections we carry out on their behalf for the year. These are entered in the Scottish Primary Production Official Controls System (SPPOCS) database and for this year we have indicated we will do 48 Inspections on behalf of the FSA;

Feed Hygiene – this is based on the Risk Assessment assigned to the business as well as their current status regarding Registration [with the Local Authority] and other relevant factors such as history or our confidence in their procedures to ensure no feed hygiene incident takes place. This normally amounts to about another 14 inspections per annum;

Sampling – this is risk-based and focuses on feed manufacturers. We are awaiting guidance from the FSA to allow us to finalise our sampling programme.

Complaints/enquiries – we will respond to any complaints received regarding feed or general enquiries

Incidents –This will be reactive.

Types of Premises inspected:-

Farms – livestock, arable and mixed;

Feed Producers

Transporter/Distributors dealing in Feed Products

To determine how often a business is inspected a risk rating system is used whereby each business is given a score, based on a number of factors, and this is then compared against a nationally accepted table. This system has been updated in 2013, and the new risk rating bands are as follows:

Inspection Frequency		
Category Points	Points Range	Minimum Inspection Frequency
A	121 to 180	at least every 12 months
B	71 to 120	at least every 24 months
C	15 to 70	at least every 60 months

Establishments rated as low risk (70 or less) need not be included in the planned inspection programme but must be subject to an alternative enforcement strategy at least once in every 5 years.