

To: Lead Food Officers,  
Heads of Service,  
Chief Executives

Cc: SFELC, REHIS

22 January 2020

Ref: FSS/ENF/20/001

Dear Colleague

## **Implementation of Official Control Verification (OCV)**

### **OCV Guidance**

Food Standards Scotland (FSS), working with Local Authorities, are implementing an improved system for the approval and inspection of food establishments in Scotland that produce food of animal origin, helping to drive a consistent approach across national and local regulators in line with better regulation commitments. There will be a phased implementation over a 2 year period to the approach to allow Local Authorities to plan for change effectively.

This guidance has been published today and can be found [here](#) on the FSS website.

The document provides a methodology to be applied when undertaking official control activities within establishments subject to approval under Regulation (EC) No 853/2004 in Scotland. Its objective is to provide a framework which, when uniformly applied across all Competent Authorities in Scotland, will ensure a methodical and consistent approach that meets the requirements of the legislation, secures a high level of public health protection and protects the reputation of Scottish food businesses.

FSS, SFELC and SOCOEH consider this project to be of strategic importance to Scotland's preparations for the UK's exit from the EU. Ensuring that approved food establishments (all of which currently enjoy free trade across EU member states) are compliant and the system of official control assurance is robust, consistent and of a high quality is key to providing a platform upon which any future export arrangements can be discussed.

## Scottish National Protocol (SNP)

This has been updated and takes into account changes agreed at the SFELC Approved Establishments Working Group meeting. The changes include updates to the following sections:

Page 13 – King scallops – 10 tonnes and other live bivalve molluscs – 10 tonnes.

Page 15 – 5.16. Small quantities and footnote,  
Wild game carcasses in fur or feather,  
Wild game meat,  
Slaughter that is carried out for private domestic consumption.

Page 16 – Composite products and footnote.

Page 18 – [rare breeds meat](#).

Page 21 – 6.18. Applications for approval.

Page 24 – 7.5. Determination of an Approval Application.

Page 29 – 8.4. Approval Documentation and  
Refusal to issue an approval.

Page 31 – 9.4. Approval numbers.

Page 32 – 9.9. Moving premises within the same CA area – retaining approval  
numbers.

Page 36 – 11.13. Rewrapping and repackaging establishments.

Page 38 – 11.26. Co-located Approval Activities establishments and 11.27. Co-located  
852/2004 Activities within FSS Approved Establishment.

Page 39 & 40 – 12.9 & 12.10. Additional activities.

Page 44 – 12.29. Change of trading name.

Page 46 & 47 – 12.42. Surrender of approval & Establishments no longer engaged in  
Approvable Activity 12.47 & 12.48.

Page 51 – 13.8. Review with a view to suspension or withdrawal of an approval.

Glossary – Addition of retail definition.

The updated SNP can be found [here](#) on the FSS website.

## OCV Implementation Guide

The Implementation Guide outlines the proposed strategy for implementation of the OCV approach in Approved Establishments throughout Scotland from January 2020 – April 2022. This strategy takes into consideration recommendations from the pilot, the roll out of the OCV training programme and the future Approvals Food Law Code of Practice. It also aims to minimise the anticipated increase in resources through a phased implementation.

It should be emphasised that this strategy is the recommended approach to achieve the anticipated full implementation date of April 2022. Local Authorities may choose an alternative approach, however, this may result in a more noticeable impact on resources if the implementation period is significantly reduced.

It also includes information on planning and preparation, inspections, administration and there's a brief Q&A.

The OCV Implementation Guide can be found [here](#) on the FSS website.

## HACCP Study Guide

A key component of the approach outlined in the OCV Guidance is the OCV Study. This is intended to provide an external reference point or standard with which the Food Control Management System (FCMS) is compared and contrasted. The creation of this external reference point is critical to the analysis of the FCMS.

It is acknowledged that the scope of a FCMS is more comprehensive than that of a HACCP, however, the scope of this document is specific to the HACCP study which encompasses the management of generic food safety hazards within the pre-requisites programmes and the management of food specific hazards within the HACCP Control Chart

This guidance represents a methodology for conducting a HACCP study from the standpoint of a food law enforcement officer. This involves the use of algorithms which are intended to represent the officer's thinking, although this should not unduly restrict natural thought processes. The aim is to gauge the adequacy of the FCMS in terms of food safety.

The HACCP Study Guide can be found [here](#) on the FSS website.

## Pilot Evaluation

FSS and nine Scottish Local Authorities piloted the new system across a sample of approved establishments.

The aims of the pilot were to;

- Determine if the new system was fit for purpose.
- Evaluate the resource required to deliver this new system.
- Evaluate the impact of this new system on food business.

This pilot was subject to an independent third party evaluation, and as part of this evaluation, pilot businesses were given an opportunity to provide anonymous feedback in order to assess businesses experiences in the system.

This evaluation has been published online and can be accessed [here](#) with the Pilot Evaluation Appendices [here](#).

## Training

The remaining 3 OCV Courses are fully subscribed and due to take place as follows:

27 – 31 January 2020: Double Tree, Dundee

20 – 24 April 2020: Double Tree Westerwood, Cumbernauld

8 – 12 June 2020: Double Tree, Dundee

However, in order to ensure that any last minute cancellations can be re-allocated at short notice we are looking to identify a reserve delegate for each of the remaining 3 courses. This person would need to be able to keep their calendars free for the week of

the course and carry out the pre-course reading/preparation in the event that they are offered a place at short notice.

If you are interested, please contact [LaTraining@fss.scot](mailto:LaTraining@fss.scot) providing your name, mobile number (in the event that we need to contact you about a place urgently) and which course dates you'd be available for.

## Knowledge Hub

A Knowledge Hub page has been prepared and is moderated by the SFELC Approved Establishments OCV Implementation Working Group. It can be found [here](#).

The information provided is accurate to the best of our knowledge and hopefully will be of use. It is not nor is it intended to be a substitute for legal advice. It is guidance only - it should not be relied upon or used for any other purpose.

If you wish to add anything, identify a correction or are aware of a better tool which we can host here then please email [sfelc@fss.scot](mailto:sfelc@fss.scot).

If you have any queries on this letter, please do not hesitate to contact me.

Yours sincerely,

Lorna Murray  
Food Standards Scotland