

Food Standards Agency in Scotland

Report on the Audit of Official Controls on Feed of Non-Animal Origin (FNAO) and Feed Establishments, including Primary Production of Food and Feed

Dumfries and Galloway Council

15-17 January 2013

Foreword

Audits of Local Authorities' feed and food law enforcement services are part of the Food Standards Agency's arrangements to improve consumer protection and confidence in relation to feed and food. These arrangements recognise that the enforcement of UK feed and food law relating to food safety, hygiene, composition, labelling, imported food and Feeding Stuffs is largely the responsibility of local authorities. These Local Authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services. The Agency's website contains enforcement activity data for all UK Local Authorities and can be found at: www.food.gov.uk/enforcement/auditandmonitoring.

This programme of focused audits in Scotland had been specifically developed to address two of the priorities identified in the Food Standard Agency's Strategy for 2010-2015 in meeting the outcomes that feed meets the legislative requirements for animal consumption and is safe to enter the human food chain and that regulation is effective, risk-based and proportionate. The strategic priority is to ensure risk-based, targeted checks at inland feed establishments and effective local authority monitoring throughout the feed chain. The audits will also be an opportunity for the Agency to establish the level of controls being implemented by Local Authorities (LAs) following the EU Food and Veterinary Office (FVO) Mission to the United Kingdom on animal feed controls which took place from 16-26 June 2009 and the subsequent follow up in (November 2011). The report entitled 'The Implementation of Measures Concerning Official Controls on Feed Legislation' is available from the Europa website at: http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=2335.

Agency audits assess Local Authorities' conformance against the Feed and Food Law Enforcement Standard ("The Standard"), which was published by the Agency as part of the Framework Agreement on Official Feed and Food Controls by Local Authorities (amended April 2010) and is available on the Agency's website at: <http://www.food.gov.uk/multimedia/pdfs/enforcement/frameworkagreementno5.pdf>

It should be acknowledged that there will be considerable diversity in the way and manner in which local authorities may provide their feed enforcement services reflecting local needs and priorities.

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that local authorities are providing an effective feed law enforcement service. The scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Agency policy on Feeding Stuffs. Parallel Local Authority audit schemes are implemented by the Agency's offices in the countries comprising the UK.

For assistance, a glossary of technical terms used within the audit report can be found at Annexe C.

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1. Introduction

- 1.1 This report records the results of an audit of Dumfries and Galloway Council with regard to feed law enforcement, under relevant headings of the Food Standards Agency Feed and Food Law Enforcement Standard. The audit focused on the Service's arrangements for inland controls of feed of non-animal origin. The audit was undertaken as part of the Agency's focused audit programme of feed controls in Scotland. This report had been made publicly available on the Agency's website at:
www.food.gov.uk/enforcement/auditandmonitoring/auditreports

Reason for the Audit

- 1.2 The power to set standards, monitor and audit local authority feed and food law enforcement services was conferred on the Food Standards Agency by the Food Standards Act 1999 and the Official Feed and Food Controls (Scotland) Regulations 2009. This audit of Dumfries and Galloway Council was undertaken under section 12(4) of the Act and Regulation 7 of the Regulations as part of the Food Standards Agency's annual audit programme. Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law includes a requirement for competent authorities to carry out internal audits or to have external audits carried out. The purpose of these audits is to verify whether official controls relating to feed and food law are effectively implemented. To fulfil this requirement the Food Standards Agency, as the central competent authority for feed and food law in the UK, had established external audit arrangements. In developing these, the Agency had taken account of the European Commission guidance on how such audits should be conducted.¹

Scope of the Audit

- 1.3 The audit examined Dumfries and Galloway Council's policies and procedures for the control of feed not of animal origin (FNAO) and primary production food and feed.

1.4 The audit scope included the assessment of local arrangements for service planning, delivery and review,

¹ Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No. 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules (2006/677/EC)

provision and adequacy of officer training, authorisations, implementation and effectiveness of feed control activities, including inspection, sampling and enforcement. Maintenance and management of appropriate records in relation to feed and internal service monitoring arrangements were also covered.

1.5 The on-site element of the audit took place at the Municipal Chambers, 75 Buccleuch Street, Dumfries, DG1 2AD. The audit included a verification visit to a primary producer to assess the effectiveness of official controls implemented by the Service and more specifically, the checks carried out by the

Service's officers to verify compliance with feed law requirements.

Background

- 1.6 Dumfries and Galloway had a population of 148,000 and a land area of 6425 km². It is a rural area with the main town being Dumfries (population 31, 600) and the chief industries are farming, with over 2500 farms, forestry, light industry and tourism.
- 1.7 Feed enforcement, including animal health and welfare duties, is carried out by the Environmental Standards, which is a service within Strategic Housing & Commissioning and Environmental Standards, which itself is within Planning and Environment.
- 1.8 At the time of audit 1.05 FTE officers carry out feed law enforcement, including primary production. This compliment comprises of 0.35 FTE from a level two Officer, and 0.65 FTE from two level one Officers, with 0.05 management input.

2. Executive Summary

- 2.1 The Authority had a Food Service Plan – Feeding Stuffs for 2012/2013 which was in accordance with the Service Planning Guidance in the Framework Agreement. The Plan could be further improved in relation to feed by including specific reference under the headings within the Plan, for example inspections of secondary feed producers (Aims and Objectives) and feed sampling policy (Service Delivery). There was no evidence of any annual review of the Service Plan.
- 2.2 Operational aide memoires and checklists in relation to primary production are in place for Officers to use. Further Enforcement procedures relevant to the size and scope of the Service need to be developed and implemented across the full range of enforcement activities.
- 2.3 The Authority should review the Officer authorisation procedure, linking the required procedure to officer qualifications and competency. Officers were receiving training in accordance with Continuing Professional Development requirements. Those Officers interviewed were able to demonstrate a good working knowledge of feed legislation controls
- 2.4 The Authority had an electronic database for the recording of feed law enforcement activities, which was capable of providing information necessary for official returns.
- 2.5 The Authority had developed an inspection programme for the year 2012-2013 based on risk assessment scoring. Primary Production inspections are carried out in accordance with the contract agreed with the Food Standards Agency. The Service Plan describes the demands on the Service. The Enforcement Policy however states that the authority “will not make routine visits to premises rated as medium or low”
- 2.6 The Authority had effective liaison arrangements in place both locally and nationally.
- 2.7 A sampling procedure is in place and sampling results are generally dealt with effectively, however, a sampling programme has not been developed. Record checks were carried out on feed samples and it was found that the Authority had taken appropriate action as detailed in Enforcement Policy by informing the Food Standards Agency of a potential incident.
- 2.8 The authority had developed and implemented an appropriate Generic Enforcement Policy, last updated in March 2011, which had been approved at the appropriate level.
- 2.9 There is a generic investigation of complaints documented procedure which is being followed and the Enforcement Policy, in relation to complaints, is also being adhered to.

- 2.10 Records of feed law enforcement were maintained electronically and in hard copy. Records in relation to businesses were generally retrievable at the time of the audit.
- 2.11 Auditors discussed the benefits of documenting and implementing a formal monitoring procedure to ensure proportionate and risk-based monitoring to cover the full range of enforcement activities in relation to feed controls.
- 2.12 A visit to a local primary production feed and food business was carried out as part of the audit. The purpose of the visit was to assess the effectiveness of the Officer's evaluation of the compliance of the business with legislative requirements. The Officer was familiar with the operations taking place at the business and the visit demonstrated that the Officer understood the key feed operations and risks at the establishment

3. Audit Findings

3.1 Organisation and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 The Authority had a 2012/2013 Environmental Standards Food Service Plan – Feeding Stuffs in place which in relation to food was in accordance with the Service Planning Guidance in the Framework Agreement. The Plan could be further improved in relation to feed by including specific reference under the existing headings within the Plan, for example inspections of secondary feed producers (Aims and Objectives), incidents and feed sampling policy (Service Delivery) and the review mechanism and any areas of improvement.
- 3.1.2 There was no evidence of any performance review based on the Service Plan having been carried out or appropriately approved. Auditors discussed the benefits of further improving the annual review to focus on relevant feed activities and the identification of areas for improvement.
- 3.1.3 Auditors discussed the 2011 FVO Feed Audit Report with the Authority. The Authority had agreed to address the findings of a reality check, undertaken as part of that audit, at the next scheduled inspection. As a result, action has not yet been taken to ensure compliance with legislative requirements. The FVO report is available at (http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=2826).

Recommendation

3.1.4 The Authority should:

Further develop the Food Safety Enforcement Service Plan in full accordance with the Service Planning Guidance in the Framework Agreement. The Plan could be further improved in relation to feed by including specific reference under the headings within the Plan, for example secondary feed producers, incidents and feed sampling policy together with a detailed review of any variation from the previous year's Plan and the identified improvements.

[The Standard - 3.1]

Documented Policies and Procedures

- 3.1.5 The Authority had the required policies in place; however evidence was not available to demonstrate that all procedures required were documented. A robust document control system for feed enforcement, similar to that in place for metrology, should be considered as the current system is incomplete.

- 3.1.6 Procedures and policies are controlled by the Lead Officer for Feed. Further enforcement procedures relevant to the size and scope of the Service need to be developed and implemented across the full range of enforcement activities.

Recommendation

- 3.1.7 The Authority should:

Continue to review and update documented procedures relating to all feed enforcement activities at regular intervals and whenever there are changes to legislation or centrally issued guidance.

[The Standard - 4.2]

Authorised Officers

- 3.1.8 The Authority had a Corporate Scheme of Delegation to Officers which was last reviewed in May 2012. The Head of Strategic Housing and Commissioning and Environmental Standards had been appropriately given delegated authority to delegate employees to enforce legislation. Officers were appropriately authorised.
- 3.1.9 There was no documented procedure set up or implemented for the authorisation of officers as required by The Standard. Auditors discussed the recent service changes that have introduced Performance Review and Development record keeping with the benefit of using this as an assessment of officer competence to ensure that there is a link between competency and the authorisation in accordance with the Feed Law Enforcement Code of Practice.
- 3.1.10 Auditors discussed the qualifications of an existing authorised Officer in relation to holding the necessary qualifications as detailed within the Feed Law Code of Practice. Following the on-site audit it was confirmed that the holding of a Certificate in Animal Health and Welfare demonstrates sufficient knowledge and understanding to comply with the requirements of the Food Law Code of Practice at Annex 10: Primary Production.
- 3.1.11 Officer training needs were identified as part of an annual performance and development review process. Officers involved in feed official controls have achieved the minimum ongoing training of 10 hours continual professional development as specified in the Feed Law Enforcement Code of Practice. The Authority had taken advantage of feed training as it becomes available.
- 3.1.12 An Officer had qualifications for the assessment of complex quality assurance systems and had received training in HACCP principles. Other

officers were not trained in the components of quality control systems and auditing techniques to ensure the effectiveness and operations of simple systems, required for a level 1 officer.

- 3.1.13 An Authorised Officer interviewed during the audit was able to demonstrate knowledge of primary production food and feed legislation and the authorities Enforcement Policy and procedures.
- 3.1.14 Copies of Officer qualifications and training records were available.

Recommendation

3.1.15 The Authority should:

Review the documented procedure for the authorisation of Officers and ensure that the level of authorisation is linked to the level of qualifications and competence required by the Feed Law Enforcement Code of Practice and centrally issued guidance

[The Standard – 5.1]

Recommendation

3.1.16 The Authority should:

Ensure that all authorised officers receive the training needed to be competent to deliver the technical aspects of the work in which they will be involved.

[The Standard – 5.4]

Facilities and Equipment

- 3.1.17 The Authority had an electronic database for recording feed law enforcement activities which was capable of providing information necessary for official returns to the Agency. The Authority had developed and implemented a documented procedure to ensure that the database was accurate and up to date.
- 3.1.18 The Authority had ensured access to suitable equipment for the sampling of Feeding Stuffs.

- 3.1.19 With regard to primary production, the Authority also inputs data following completed inspections onto the Scottish Primary Production Official Control System (SPPOCS).

Liaison with Other Organisations

- 3.1.20 The Authority had developed liaison arrangements with central government, other enforcement bodies, professional organisations, and external stakeholders.
- 3.1.21 Locally, the Authority is a member of the West of Scotland Quality Group which discusses Feeding Stuffs.
- 3.1.22 Joint visits have also been carried out with the local Inspections & Investigations Team where applicable.

3.2 Feed Control Activities

Feed Establishments Interventions and Inspections

- 3.2.1 Auditors were advised that there were 8 feed premises in the area carrying out activities requiring approval under the legislation. These were inspected by a Level 2 Qualified Officer.
- 3.2.2 The Authority advised that the majority of inspections are pre-notified in writing by up to 48 hours to ensure that the appropriate personnel are available at the time of inspection. Inspections are recorded using a visit checklist as an aide memoire and actions on any non-compliances found are being acted upon in accordance with the Enforcement Policy.
- 3.2.3 The Authority had developed an inspection programme for the year 2012-2013 based on a scoring system mainly based on the LGR scoring system.
- 3.2.4 In addition, 77 inspections were planned to premises subject to the primary production requirements of Annex I of Regulation (EC) No. 852/2004 and Annex I and III of Regulation (EC) No 183/2005. The Authority notifies the Food Standards Agency of the premises selected for primary production inspections, as required by the contract of agreement with regard to funding for the implementation of food and feed primary production enforcement in Scotland 2012/2013. Premises are risk rated and selected in accordance with the 2% and 25% frequency as described in Annex 10 of the Food Law Code of Practice.
- 3.2.5 The Authority has an "Inspection Procedures" document which determines how premises are chosen, when they are to be inspected and actions to be taken after the inspection. In addition, inspection checklists and report templates are in place for Officers to use. The inspection checklist covers the scope and scale of the business but does not fully cover the requirements of the Inspection Record files section of the Feed Law Enforcement Code of Practice (Annex 6).
- 3.2.6 The Enforcement Policy details that routine visits to medium and low risk premises are specifically excluded from the inspection programme, but may be subject to visits for project work. Premises that are classified as "producers" are stated as being subject to inspection "at least once a year".
- 3.2.7 Record checks of seven feed and food primary production inspections confirmed that in all cases the Authority were using inspection checklists. Inspection reports or letters are being sent following all primary inspections or are left on site.
- 3.2.8 With regard to premises subject to the requirements of Annex II of Regulation (EC) No 183/2005, an enhanced checklist is in place for Officers to use which includes the provision for recording information on traceability, cross contamination, hygiene, and the quality control plan.

- 3.2.9 The inspection report routinely provided to the business operator indicated the key points discussed during the inspection but did not always clearly differentiate between the actions required to comply with legal requirements and recommendations of good practice, as required by the Authority's Enforcement Policy and the Feed Law Enforcement Code of Practice.

Recommendations

- 3.2.10 The Authority should:

Carry out feeding stuffs establishments inspections at a frequency which is not less than that determined under the relevant inspection rating scheme and in accordance with the legislation, Feed Law Enforcement Code of Practice or centrally issued guidance.

[The Standard – 7.1 and 7.2]

Verification Visit to Feed Premises

- 3.2.11 During the audit, a verification visit was undertaken to a primary producer of feed and food. The main objective of the visit was to assess the effectiveness of the Authority's assessment of the feed business operators' compliance with the feed law requirements of Regulation (EC) No 183/2005 laying down requirements for feed hygiene, the Feed Law Enforcement Code of Practice and the Authority's own procedures.
- 3.2.12 An interview was held with the Officer who carried out the last inspection before the verification visit took place, to confirm the contents of the file records and the opportunity to explain the inspection process, i.e. the preparatory work carried out prior to an inspection and the general process while on site, which included the general hygiene checks to verify compliance with the structure and hygiene practice requirements, and checks carried out to verify compliance with feed composition and traceability.
- 3.2.13 The visit confirmed that the inspection carried out by the Officer had been carried out as documented and had included an assessment of the business records as well as compliance with structural requirements and hygiene practice. Details had been recorded on an aide memoire as specified in the appropriate procedure.
- 3.2.14 The areas of Regulation (EC) No 183/2005 Annex I and Regulation (EC) No 852/2004 Annex I on the hygiene provisions and record keeping for primary production for feed business operators and food business operators

respectively, which were inspected were reported in an inspection report left with the business after the inspection.

- 3.2.15 The verification visit demonstrated that the inspection had followed the Authority's policies and procedures and that the inspection report issued afterwards was relevant and appropriate. The Officer who had conducted the inspection was knowledgeable about the business and its activities.

Feed Inspection and Sampling

- 3.2.16 The Authority had not developed and implemented an annual sampling programme, however the Service Plan indicated that an appropriate number of samples would be taken after consideration of the FSA Guidance on Enforcement Priorities for Feed Authorities.
- 3.2.17 The sampling procedure is generic and is based on the taking of informal samples. File checks showed that sampling results had generally been dealt with effectively in accordance with the Feed Law Enforcement Code of Practice, and feed business operators had been advised of the outcomes and appropriate advice given.
- 3.2.18 Where unsatisfactory third party informal compositional test results indicated a potential feed incident, the Authority's Enforcement Policy was followed and the Agency were informed of a potential non-local serious feed hazard.
- 3.2.19 The official laboratory used by the Authority for feed sampling activities had been properly accredited.
- 3.2.20 The aide memoir and checklists used by the authority do not contain references to feed inspection and so information is not being collected. There is also no procedure for the inspection of Feedingstuffs.

Recommendation

- 3.2.21 The Authority should:

Set up, maintain and implement a documented procedure for the inspection of Feedingstuffs in accordance with relevant legislation, the relevant Code of Practice and centrally issued guidance.

[The Standard – 12.3]

Recommendation

3.2.22 The Authority should:

Set up and implement a documented sampling programme in accordance with relevant legislation, the relevant Code of Practice and centrally issued guidance.

[The Standard – 12.4]

Enforcement

- 3.2.23 The authority had developed and implemented an Enforcement Policy which had been approved by the previous Trading Standards Manager as the relevant senior officer. The Policy confirms the Authority's aims that enforcement decisions will be consistent, balanced, fair and relate to common standards that ensure that the public is adequately protected.
- 3.2.24 No feed enforcement activity beyond advice had been deemed necessary by the Authority in recent years. Although some feed law enforcement procedures had been developed and implemented, the Authority should develop and implement further procedures and documentation to cover the full range of feed enforcement activities, in accordance with the Feed Law Enforcement Code of Practice to ensure that Officers have useful guidance should they need to exercise their statutory powers.
- 3.2.25 Operational aide memoires and checklists in relation to feed law enforcement are in place for Officers to use.

Recommendation

3.2.26 The Authority should:

Set up, maintain and implement documented enforcement procedures for the range of enforcement actions and follow up action for feed law enforcement in accordance with the relevant legislation, the relevant Code of Practice and centrally issued guidance.

[The Standard – 15.2]

Feed Safety Incidents

- 3.2.27 The Authority's Service Plan refers to Feed Incidents and Alerts. However there was no reference in this or accompanying procedures for the originating of a feed incident through effective enforcement activities. No feed alerts had recently been issued by the Food Standards Agency,

although there was evidence that the Authority had notified the Agency of an incident.

Feed Complaints, Primary Authority Scheme and Home Authority Principle

- 3.2.28 The Service Plan refers to these areas, with some procedures in place and that they will be dealt with in accordance with the Generic Consumer Complaints System. Feed complaints that had been received at the time of audit were being investigated in accordance with the Enforcement Policy. In one case there appeared to have been a documented intention to visit an establishment to pursue and evaluate further sampling by the feed business concerned following discussions about a sample failure. This visit and formal sample took place a considerable time later. The final outcome of the sample failure was unclear.
- 3.2.29 The Authority confirmed support for the Home Authority Principle; however did not formally act as Home for any feed businesses within their area.

Advice to Business

- 3.2.30 Business advice was given through:
- *'on the spot' advice during visits*
 - *Information leaflets*
 - *Responding to enquiries*

3.3 Internal Monitoring and Third Party or Peer Review

Internal Monitoring

- 3.3.1 The Lead Officer for Feed is responsible for carrying out internal monitoring. Quantitative monitoring takes place in the form of informal and minuted formal meetings between the Lead Officer and operational staff to monitor and discuss workloads, inspection and sampling programmes and any issues which may have arisen in regard to individual cases.
- 3.3.2 Although a formal internal monitoring procedure is not in place, regular informal monitoring activity is taking place. Auditors discussed the benefit of developing and implementing risk-based monitoring procedures to ensure all areas of feed law enforcement activity were monitored to verify conformance with the Standard. The monitoring should be routinely recorded.

Recommendation

3.3.3 The Authority should:

Set up, maintain and implement documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004 (Official Feed and Food Controls), the Feed Law Enforcement Code of Practice and centrally issued guidance. Internal monitoring should be recorded.

[The Standard - 19.1 and 19.3]

Records

- 3.3.4 Records of feed law enforcement activity were maintained electronically and in paper files. Records in relation to inspections and sampling were generally retrievable, up to date and accurate. Information on the size, scale and type of feed activity of the business was routinely held on hard copy files but was not always available on the database.
- 3.3.5 The Feed Law Enforcement Code of Practice requires that records be kept for at least six years. The Authority is moving towards a transfer of data to an electronic form which shall be available for the required length of time. Generally, most information from the hard copies had been transferred to the electronic version prior to destruction.
- 3.3.6 Premises records contained sufficient detail to ascertain the inspection history of the business and reports to feed businesses included most of the information required by the Feed Law Enforcement Code of Practice.

Third Party or Peer Review

- 3.3.7 The Authority had not participated in any inter-authority audit or peer review process relating to the feed service in the last two years.

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ANNEXE A

Updated Action Plan for Dumfries and Galloway Council

Date of Audit : 15 - 17 January 2013

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN
<p>The Authority should further develop the Food Safety Enforcement Service Plan in full accordance with the Service Planning Guidance in the Framework Agreement. The Plan could be further improved in relation to feed by including specific reference under the headings within the Plan, for example secondary feed producers, incidents and feed sampling policy together with a detailed review of any variation from the previous year's Plan and the identified improvements.</p> <p>[The Standard - 3.1]</p>	<p>31/03/2013</p>		<p>Completed</p>	<p>The Service Plan has been reviewed (March 2013). The following actions have been taken:</p> <p>Review the Plan and add headings which directly correspond with those in the Standard.</p> <p>Improve the Plan by adding content as recommended under each of the headings in accordance with the Guidance given in Chapter One of the Framework Agreement.</p> <p>Addition of review information from the previous year's Plan which will include identified improvements and Head of Service Approval.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN
<p>The Authority should continue to review and update documented procedures relating to all feed enforcement activities at regular intervals and whenever there are changes to legislation or centrally issued guidance.</p> <p>[The Standard - 4.2]</p>	31/03/2013		Completed	<p>Incorporated review panels into all documents when they are updated.</p> <p>Ensured that documented procedures are hyperlinked into the Service Delivery Plan so that they will automatically be subject to review at the same time as the Plan.</p>
<p>The Authority should review the documented procedure for the authorisation of Officers and ensure that the level of authorisation is linked to the level of qualifications and competence required by the Feed Law Enforcement Code of Practice and centrally issued guidance.</p> <p>[The Standard – 5.1]</p>	31/03/2013		Completed	<p>A procedure has been drawn up in accordance with Paragraph 5 of the Standard to refine and formalise the current position where only competent officers would be allocated enforcement duties. These duties will be allocated in accordance with the level of competency each officer has.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN
<p>The Authority should ensure that all authorised officers receive the training needed to be competent to deliver the technical aspects of the work in which they will be involved.</p> <p>[The Standard – 5.4]</p>	30/06/2013	<p>The current CPPD scheme will be continued, ensuring that the Level 1 and Level 2 Officers receive a minimum of 10 hours core training each year. Online training resources will be used to supplement the FSA provided training if required.</p> <p>Further training on HACCP, basic quality control systems and auditing techniques will be delivered to the Level One officers by the Level Two officer before 30/06/2013.</p>	Completed	<p>All Officers currently engage in a scheme of CPPD which is monitored by the Service Manager. Training on HACCP, basic quality control systems and auditing techniques have been delivered to the Level One officers by the Level Two officer. All relevant officers received at least 10 hours of core training in 2013.</p>
<p>The Authority should carry out feeding stuffs establishments inspections at a frequency which is not less than that determined under the relevant inspection rating scheme and in accordance with the legislation, Feed Law Enforcement Code of Practice or centrally issued guidance.</p> <p>[The Standard – 7.1 and 7.2]</p>	30/09/2013	The Enforcement Policy will be revised to meet the requirements of the Framework Agreement	Completed	The Enforcement Policy has been revised and signed off by the new Head of Service.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN
<p>The Authority should set up, maintain and implement a documented procedure for the inspection of Feedingstuffs in accordance with relevant legislation, the relevant Code of Practice and centrally issued guidance.</p> <p>[The Standard – 12.3]</p>	31/03/2013		Completed	<p>The Service Delivery Plan has been amended to incorporate a hyperlink to the Inspection Procedure for ease of reference. The Inspection Procedure contains a link to the Inspection Checklist which has been amended to include comments on the actual condition of the stored feeds at the time of inspection.</p>
<p>The Authority should set up and implement a documented sampling programme in accordance with relevant legislation, the relevant Code of Practice and centrally issued guidance.</p> <p>[The Standard – 12.4]</p>	31/03/2013		Completed	<p>The sampling procedure has been amended to include details of how and when the sampling programme is established (Level Two Officer consults with Lead Officer and then notifies the Level One Officers by email what they should be sampling, how, from where and when). Detail will be added to acknowledge the results of sampling with respect to follow up action, if required.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN
<p>The Authority should set up, maintain and implement documented enforcement procedures for the range of enforcement actions and follow up action for feed law enforcement in accordance with the relevant legislation, the relevant Code of Practice and centrally issued guidance.</p> <p>[The Standard – 15.2]</p>	31/03/2013		Completed	<p>Follow up action has been incorporated into the Sampling Procedure and a new Enforcement Action procedure has been drawn up which covers the range of enforcement actions available.</p>
<p>The Authority should set up, maintain and implement documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004 (Official Feed and Food Controls), the Feed Law Enforcement Code of Practice and centrally issued guidance. Internal monitoring should be recorded.</p> <p>[The Standard - 19.1 and 19.3]</p>	31/03/2013		Completed	<p>The Lead Officer has extended the monitoring activities to include occasional joint inspections, as recommended during discussions with the auditors.</p> <p>A documented internal monitoring procedure has been created in accordance with the recommendation.</p>

Actions accepted by auditors : Audit file closed 19 May 2014

ANNEXE B

Audit Approach/Methodology

The audit was conducted using a variety of approaches and methodologies as follows:

(1) Examination of LA policies and procedures.

The following LA policies, procedures and linked documents were examined before and during the audit:

- Food Service Plan – Feeding Stuffs 2012/2013
- Trading Standards Work Plan 2012-2013
- Scheme of Delegation – Environmental Standards
- Scheme of Delegation Report (May 2012)
- Performance and Development Review, Staff document set.
- Consumer & Trader advice/education
- Customer service standards
- Animal Feeding stuffs registration advice
- Application form for Registration or Approval
- Inspection Procedures
- Feeding Stuffs sampling procedures
- Feed Alerts Policy and Procedure
- Enforcement Policy
- Feed business Improvement notice
- SCOTSS West of Scotland Quality Group meeting minutes
- Trading Standards team meeting minutes

(2) File reviews – the following LA file records were reviewed during the audit:

- Authorisation, qualification and training records
- Feed premises inspection records and reports
- Feed sampling records

(3) Interviews – the following officers were interviewed:

- Audit Liaison Officer
- Authorised Officer who carried out the most recent inspection at the premises selected for a verification visit.

Opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.

(4) On-site verification check:

A verification visit was made with the Authority's Officer to a local feed business. The purpose of the visit was to verify the outcome of the last inspection carried out by the Local Authority and to assess the extent to which enforcement activities and decisions met the requirements of relevant legislation, the Feed Law Code of Practice and other official guidance.

Glossary

Agricultural Analyst	A person, holding the prescribed qualifications, who is formally appointed by a Local Authority to analyse feed samples.
Authorised Officer	A suitably qualified Officer who is authorised by the Local Authority to act on its behalf in, for example, the enforcement of legislation.
Feed Law Enforcement Code of Practice (Great Britain)	Government Codes of Practice issued under the Official Feed and Food Control (Scotland) Regulations.
Food Law Code of Practice (Scotland)	Government Codes of Practice issued under Section 40 of the Food Safety Act 1990, the Food Hygiene (Scotland) Regulations 2006 and the Official Feed and Food Control (Scotland) Regulations.
FVO	Food and Veterinary Office, part of the European Commission, based within the Directorate General for Health and Consumers
Feeding Stuffs	Term used in legislation on feed mixes for farm animals and pet food.
Food Examiner	A person holding the prescribed qualifications who undertakes microbiological analysis on behalf of the Local Authority.
Food hygiene	The legal requirements covering the safety and wholesomeness of food.
Formal samples	Samples taken in accordance with the requirements of the Feed Law Enforcement Code of Practice in accordance with the relevant sampling regulations and submitted to an accredited laboratory on the official list.
Framework Agreement on Official Feed and Food Controls by Local Authorities	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> • Service Planning Guidance • Food and Feed Law Enforcement Standard • Monitoring Scheme • Audit Scheme <p>The Standard and the Service Planning Guidance set out the Agency's expectations on the planning and delivery of food and feed law enforcement.</p> <p>The Monitoring Scheme requires local authorities to turn to the Food Standards Agency on their food law activities i.e. numbers of inspections, samples and prosecutions.</p> <p>Under the Audit Scheme the Food Standards Agency will be conducting audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.</p>
Full Time Equivalent (FTE)	A figure which represents that part of an individual Officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to

	food enforcement.
Home Authority	An authority where the relevant decision making base of an enterprise is located and which had taken on the responsibility of advising that business on food safety/food standards issues. Acts as the central contact point for other enforcing authorities' enquiries with regard to that company's food related policies and procedures
Informal samples	Samples that have not been taken in accordance with the appropriate sampling regulation (e.g. samples for screening purposes) and/or not sent to an accredited laboratory
SPPOCS	Scottish Primary Production Official Control System.
Public Analyst	An Officer, holding the prescribed qualifications, who is formally appointed by the Local Authority to carry out chemical analysis of food samples.
RASFF	Rapid alert system for food and feed. The European Union system for alerting port enforcement authorities of food and feed hazards.
Risk rating	A system that rates feed premises according to risk and determines how frequently those premises should be inspected. For example, high risk premises should be inspected annually
Service Plan	A document produced by a Local Authority setting out their plans on providing and delivering a food or feed service to the local community.
Trading Standards	The Department within a Local Authority which carries out, amongst other responsibilities, the enforcement of feed legislation.
Trading Standards Officer (TSO)	Officer employed by the Local Authority who, amongst other responsibilities, enforces feed legislation.