

**SCOTTISH FOOD ENFORCEMENT LIAISON COMMITTEE**

**Enforcement Resources Group**

**EFFECTIVE FOOD SAMPLING**

**GUIDANCE FOR LOCAL AUTHORITIES**

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## 1. Introduction

The Food Standards Agency in Scotland organised a workshop in Edinburgh on 18 November 2009 and invited representation from all Scottish Local Authorities. The theme for this workshop was 'Making a Difference – Local Authority Food Hygiene Delivery' and 30 of the 32 Local Authorities participated.

The priorities identified became the subject of discussion at the Scottish Food Enforcement Liaison Committee meeting on 5 February 2010 when it was agreed to set up a working group to consider the Enforcement Resources, Competency of Officers and Training Methodology and involve representatives of The Royal Environmental Health Institute of Scotland (REHIS) and the Society of Chief Officers of Environmental Health in Scotland (SoCOEH) as well as The Food Standards Agency in Scotland (FSAS) and The Scottish Food Enforcement Liaison Committee (SFELC).

The Group was asked to consider the current difficulties around the topics of Enforcement Resources, Competency of Officers and Training Methodology and suggest improvements, guidance or good practice where necessary. Following the development of a Competency Matrix for Local Authority Enforcement Officers the group were asked to turn its attention to the development of guidance in relation to sampling resources.

This guidance consists of three parts:

Part 1 – the original report which aims to assess sampling activity and provide guidance to LAs on targeting resources.

Part 2 – a summary of the main factors to be considered by those responsible for the management of food sampling activity.

Part 3 - a toolkit of resources for managers and frontline environmental health staff to encourage the most efficient and effective use of resources.

It is hoped that Part 2 and, particularly, Part 3 will be “live” documents which are reviewed, corrected and updated to reflect the experience of environmental health staff in the field and to reflect best practice within the profession.

The Group hopes that this report, and the associated guidance, will encourage local authorities to develop risk and intelligence based sampling policies and programmes to optimise their use of scarce sampling resources.

**EFFECTIVE FOOD SAMPLING**

**Part 1**

**Report & Recommendations**

## 1. Background

Scottish local authority (LA) environmental health departments carry out food sampling, as part of their enforcement of UK and EU food safety law, with the samples being submitted to appointed Public Analysts or Food Examiners for analysis. The sampling and analysis of foods, including imported food from outside the EC, is an important element in food safety enforcement and is seen as a valuable tool for food enforcement staff to secure and improve standards throughout the food industry.

Food sampling activity by Scotland's environmental health departments has reduced markedly not only from the notional standards of the 1980s but in comparison to actual activity six years ago. This reduction has, in most cases, been driven by financial pressures due to the public service now entering a period where significant cuts are likely in service budgets. Food sampling will be particularly vulnerable to these cuts as, with its attendant expenditure on analysis by outside providers (ie Public Analysts), it may be seen as a soft option for local authorities striving to make politically acceptable savings in local budgets.

These twin pressures will further threaten the future of the existing Public Analyst laboratory structure as well as challenge the resilience of the service and the ability to offer the existing range of work.

The Scottish Government has set priorities in the food and drink policy *Recipe for Success*. Food sampling allows LAs to support the government and trade in a number of the aims including those surrounding reputation, growth of the industry, health and sustainable choices, resilience and public understanding.

## 2. Legislative background

The Code of Practice issued by Food Standards Agency (FSA) under Section 40 of the Food Safety Act 1990 <sup>1</sup> states that effective routine sampling is an **essential** element in delivering a well balanced enforcement service and should therefore feature in the enforcement activity of all Food Authorities. The Code goes on to outline the requirements for sampling policies and programmes:

***“Food Authorities should prepare and publish a food sampling policy and make it available to businesses and consumers. The policy should set out the Food Authority’s general approach to food sampling and its approach in specific situations such as process monitoring, Home Authority Principle, inspections, complaints, special investigations and national, regional and local co-ordinated programmes. This sampling policy should cover all samples taken including those not taken in accordance with this Code.***

***The sampling policy should detail the factors that will be taken into account in formulating the sampling programme, including any national or local consumer issues that will influence the level of sampling to be undertaken.***

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<sup>1</sup> Food Law Code of Practice (Scotland), Food Standards Agency, 2009

***Food Authorities should also prepare a sampling programme that details their intended food sampling priorities. The programme should take account of the number, type and risk ratings of the food businesses and the type of food produced in the area, the Food Authority's home or originating authority responsibilities and the need to ensure that the provisions of food law are enforced. The sampling programme should not normally be published.***

***The sampling policy should commit the Food Authority to providing the resources necessary to carry out its food-sampling programme"***

In addition the Framework Agreement (between LAs and FSA) on Local Authority Food Law Enforcement <sup>2</sup> **require** that authorities should have a local sampling policy and programme:

***"The Authority shall set up, maintain and implement a documented sampling policy and programme that shall accord with any centrally issued or relevant guidance, and relevant Codes of Practice and shall include reference to its approach to any relevant national sampling programme centrally co-ordinated by the Food Standards Agency.***

...

***The Authority should consider the nature of its food and feed establishments, and where applicable the nature of imported foods and feed, and also have regard to any relevant sampling programme centrally co-ordinated by the FSA, LACORS and the HPA and in Scotland, SFELC....***

...

**The Authority shall carry out sampling in accordance with its documented sampling policy, procedures and programme."**

### **3. Sampling as an enforcement tool**

SFELC believes that sampling is an important, and integral, tool in food safety and food standards enforcement for the following reasons.

- Protecting public health
- Detecting and deterring fraudulent activities
- Verifying that official control checks are effective
- Giving customers sufficient information to make informed choices
- Ensuring that food standards are maintained
- Informing the enforcement approach
- Providing product quality advice to the producer
- Promoting fair trade and deterring bad practice

Sometimes sampling is the only way of fulfilling these objectives; often it is a support to other interventions by authorised officers.

### **4. Sampling in the wider public policy agenda**

The Scottish Government document *Recipe for Success* <sup>3</sup> sets out the next steps in the Government's food and drink policy. The Objectives are to:

- support the growth of our food and drink Industry;

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<sup>2</sup> The Framework Agreement on Official Feed and Food Controls by Local Authorities, April 2010

<sup>3</sup> Recipe for Success – Scotland's National Food and Drink Policy, Scottish Government, 2009

- build on our reputation as a land of food and drink;
- ensure we make healthy and sustainable choices;
- make our public sector an exemplar for sustainable food procurement;
- ensure our food supplies are secure and resilient to change;
- make food both available and affordable to all; and
- ensure that our people understand more about the food they eat.

Enforcement activity, particularly sampling, supports a number of these aims and could develop in the future to support others.

Environmental health staff strive to maintain public health and provide a level playing field in the food trade. Enforcement activity is focussed on those businesses which pose a threat to public safety, mislead the public and/or seek to gain an unfair advantage over legitimate competitors. Sampling is an important tool in assessing safety of food and detecting misrepresentation or adulteration of food. This work also allows the reputation of Scottish food and drink to be safeguarded.

Recipe for Success recognises the importance of smaller food businesses in developing the government's objectives. Many of these businesses lack specialist technical knowledge ad/or resources. Environmental health staff are often able to advise and encourage these enterprises on the more technical aspects of composition and labelling legislation. Often this work is underpinned by sampling, the results of which can be used to maintain, or even enhance, the Scottish reputation for quality products.

The Government is keen that customers make better informed decisions about the food they eat. As well as the enforcement of the food labelling legislation to ensure that required information is provided for food, and that the information given is accurate, the enforcement community has worked on sampling surveys and other initiatives to highlight the nutritional profile of a number of food groups. This work has been carried forward into various initiatives at local and Scottish levels providing business guidance or informing further work by FSAS.

Public procurement is seen as an important driver in improving standards of nutrition. Local authorities are significant providers of catering and a number of environmental health departments provide support to catering colleagues by sampling ingredients and prepared meals to assess compliance with nutritional criteria.

## **5. Sampling in Scotland**

Historically, local authorities in Scotland recognised a sampling target of 2 samples per 1000 population for microbiology and 3 samples per 1000 population for chemical samples. Compliance with this target has reduced over the years. FSA recognised<sup>4</sup>, however, that sampling rates in Scotland were higher than most other areas of the UK.

The sampling policies and programmes outlined above have also seen authorities move from "shopping basket" sampling of the 1980s towards targeted sampling and analysis concentrating on products produced or packed within their own areas. This targeting also fits in with the Scottish Government's proposals for recognizing the importance of our locally produced foodstuffs.

Until local government reorganisation, in 1996, four of the regional councils provided Public Analyst (PA) laboratories offering chemical and microbiological testing and a number of NHS

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<sup>4</sup> Practical Sampling Guidance for Food Standards and Feeding Stuffs Part 1: Overall Objectives of Sampling. Food Standards Agency, 2004

laboratories offered microbiological testing. The four PA laboratories transferred to their local city authorities and NHS involvement has decreased over the years until the position now is that all Scottish LA food samples are tested in one of the four PA laboratories.

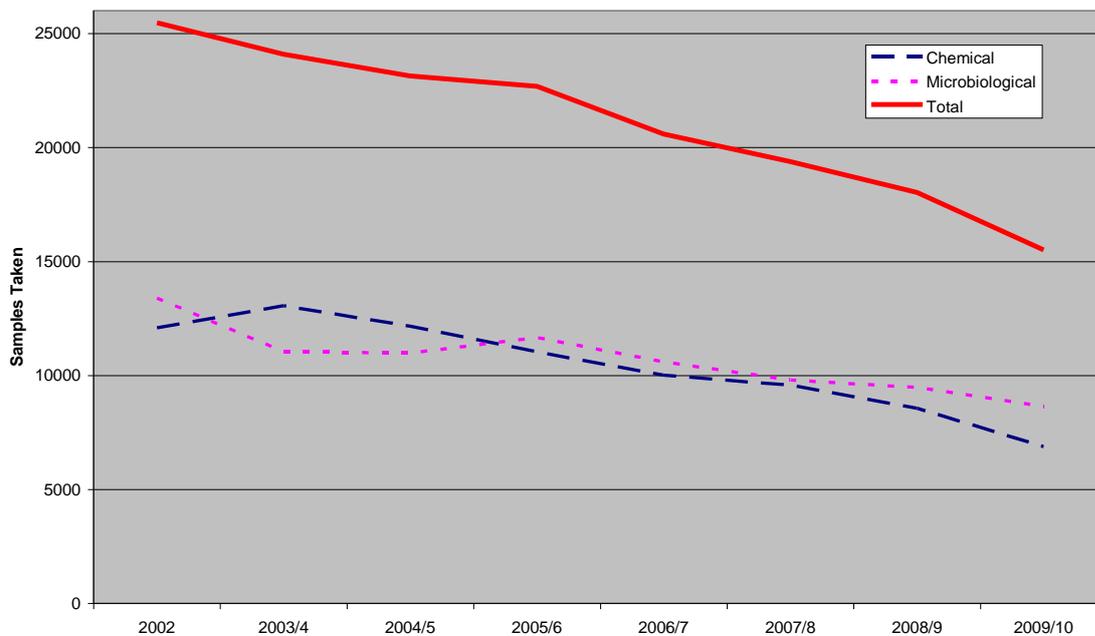
Scottish environmental health departments were early adopters, and developers, of the FSS sample and analysis recording system provided by FSA. Currently 29 of the 32 LAs use the system providing a valuable pool of information to local authority professionals and other partners.

As well as local sampling programmes, LAs participate in food survey work coordinated by local liaison groups and SFELC (via FSSC)

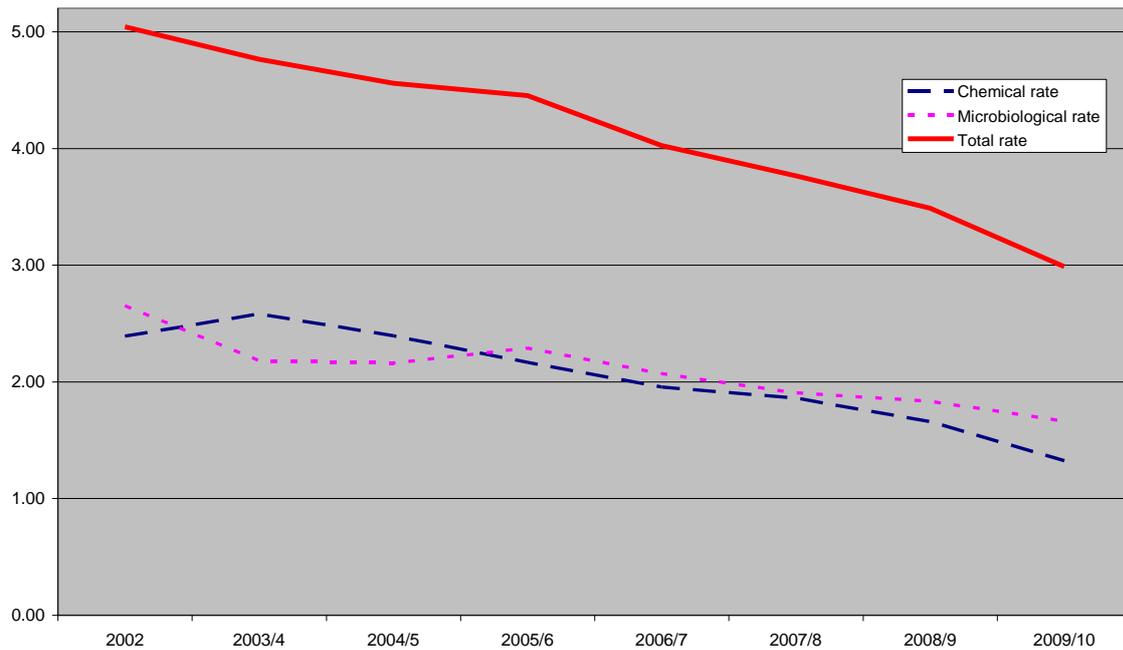
## 6. Trends in sampling

FSSC has worked with the laboratories and LAs to examine trends in sample numbers over the past few years. These are shown graphically in Graphs 1 and 2 which are prepared from data shown in Annex 1.

Graph 1 - Scottish LA Annual Food Sampling 2002 - 2009/10



Graph 2 - Scottish LA Annual Food Sampling Rates (per 1000 population)



The graphs show sampling data from 2002 (the last year examined in FSSC’s previous sampling report to SFELC) to 2009/10.

Graph 1 shows that the number of chemical samples has reduced from a high of 13054 to 6875 samples per year. Microbiological samples have, similarly fallen from 13389 to 8637. These reductions represent a fall of 48% in chemical sampling and 35% in microbiological sampling. It is interesting to note that there are now more microbiological than chemical samples taken.

The total number of food samples taken has fallen from 25480 to 15512. This represents a reduction of 39%.

Graph 2 expresses the sampling data in terms of samples per 1000 population. Whilst noting that the Scottish population has grown by around 2.8% within the period examined, the trends reflect the total samples data. The chemical rate has fallen from a high of 2.58 to 1.32 (49% reduction) and the microbiological rate has fallen from 2.65 to 1.66 (38% reduction). These figures are in stark contrast to the previous standards, discussed previously, of 3 and 2 respectively.

FSSC was unable to gather a full set of data on predicted sampling activity for 2010/11. However, the information returned did indicate the likely continuation of the trends discussed above.

## 7. Budgetary considerations

Sampling work is a routine part of local authority food safety work. As such, sampling activity and analysis fees are met from local authority budgets.

Taking samples, transporting them to labs and following up results accounts for a significant proportion of the work of all environmental health departments. Sampling programmes and survey work are such that samples have to be carefully chosen, sourced and taken. Many

food types or projects require particular sampling techniques or procedures to be adopted which can be time consuming.

A number of models exist for the relationship between individual LAs and their partner laboratories but all see environmental health departments paying the four city authorities for analysis work.

Over the past few years some LAs have put their analysis work out to tender, resulting in some LAs moving their work between laboratories. To date no LA contracts have resulted in work moving to the private sector.

After staff costs, laboratory fees are the biggest expense for most Scottish environmental health departments. Sampling and analysis budgets are, therefore, at risk from any reduction in LA spending. In many ways a reduction in spending at an external organisation is more palatable than direct cuts to an authority's own services. However, reductions in staffing levels are having an effect in Scotland's environmental health departments and will affect the ability of LAs to implement sampling policies and programmes.

Anecdotally the reduced sampling to date has been, in most cases, a function of budgetary pressures.

## **8. Future analytical service provision**

In November 2009 the Society of Chief Officers of Environmental Health in Scotland wrote to FSAS indicating that the predicted pressures on local government finance would see many LAs reducing sampling activity. The Society also recognised that this reduction in work would have an impact on laboratory providers.

Subsequent to this work by SoCOEHS and the Association of Public Analysts in Scotland, the Society of Local Authority Chief Executives (SOLACE) have requested that the CoSLA/SOLACE Improvement Service carry out a review of a unified Scientific Service for Scotland as part of the Shared Services agenda. This study would re-investigate the business case for a Scottish Public Sector scientific service which would provide greater opportunities, at a Scottish level, to deliver synergies, resources and service improvements for all public sector scientific/analytical requirements. This study will involve all four Public Analyst laboratories in Scotland.

If a new model for Public Analyst provision, and funding, is found it is likely that some local authorities will see the cost of the service increase. This may lead to a further reduction in sampling. It is unlikely that any authorities who see their costs decrease will increase sampling activity.

## **9. Risk Based Sampling**

The concept of establishing sampling policies and programmes which are based on risk is something that all stakeholders can happily endorse. Problems soon arise when any attempt is made to tease out what the phrase actually means and how it would be implemented.

The Association of Public Analysts (APA) has produced guidance on risk based sampling<sup>5</sup>.

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<sup>5</sup> Risk-Based Sampling of Food: A Scientific Approach to Sampling for Analysis Volumes 1 & 2, Public Analyst Service Ltd., 2002

To summarise what are essentially very detailed documents, the guidance promotes a risk assessment of every food on the market against a number of parameters to produce a relative sampling rate for that product. A simplified, interim, proposal is also described but again this requires a risk assessment of all food on sale.

The papers state that a comprehensive database of foods on sale and analysis results would be required. The introduction, and use, of FSS has gone some way to address the second requirement. The paper does not give any guidance on real sampling rates, only relative sampling rates. A decision still has to be taken on the amount of resource available for input.

Realistically the work required to progress the main proposal will never be resourced and even the alternative interim proposal would require a great deal of work to give relative sampling rates which an ever decreasing sampling resource is unlikely to sustain.

## **10. FSSC's role**

In this time of reduced sampling it becomes increasingly important to ensure that the resources available are best targeted to provide best value. FSSC is working towards this in a number of ways.

FSSC has reviewed participation in national surveys. Already decisions have been made to eliminate paper questionnaires and reports for Scottish LAs participating in UK-wide surveys. By using FSS sampling officers and lab staff have been spared the time consuming duplication of information.

More fundamentally, FSSC now assesses each proposed UK survey for the usefulness and practicality of participation by Scottish LAs before organizing any coordinated sampling. Over the past few years a number of surveys have not been coordinated on behalf of UK partners.

The Scottish (SFELC) survey programme has been reduced over the past few years with less surveys being conducted but with higher sample numbers to allow more meaningful and robust data to be gathered.

The SFELC Research Working Group (RWG) is now working with the wealth of sample data available from FSS not only to produce high level reports on sampling activity but to tease out areas for sampling activity development. Over time we hope that advice can be given not only on areas for more sampling work but also on samples and/or analyses that might be reduced to allow resources to be better targeted.

FSSC also provides a forum for LA and PA representatives to meet with other stakeholders to share best practice in sampling and other areas of food standards work.

## **11. Recommendations**

**Local authorities must prepare sampling programmes and policies in accordance with the requirements of the Code of Practice and Framework Agreement.** SFELC recognises that assistance is sought on prioritising sampling.

Sampling Toolkit Tool 3 gives advice on prioritising businesses to sample from. The prioritisation is based on statutory obligations, effective food safety enforcement and optimising the value obtained from sampling. Businesses are split into three priority levels.

**SFELC advises that an effective sampling programme would embrace all businesses within an LA area that are categorised as Priority 1 or 2.**

Sampling Toolkit Tool 4 uses data gathered from surveys and FSS to guide LAs on selecting sample types and analysis suites within businesses. The advice highlights food and analysis combinations which pass or fail more regularly as well as combinations where there is a lack of sample data. This Tool will be regularly reviewed as the sampling database evolves.

**SFELC advises that priority should be given to food and analysis combinations categorised as Group A or Group C.**

## Annex 1

### Annual food sampling data

	2002	2003/4	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10
Chemical	12091	13054	12164	11030	10006	9570	8561	6875
Microbiological	13389	11032	10976	11656	10588	9802	9467	8637
<b>Total</b>	25480	24086	23140	22686	20594	19372	18028	15512
<b>Population *</b>	5054800	5057400	5078400	5094800	5116900	5144200	5168500	5194000
Chemical rate (/1000 pop)	2.39	2.58	2.40	2.16	1.96	1.86	1.66	1.32
Microbiological rate (/1000 pop)	2.65	2.18	2.16	2.29	2.07	1.91	1.83	1.66
<b>Total rate (/1000 pop)</b>	5.04	4.76	4.56	4.45	4.02	3.77	3.49	2.99

\* Population data is from the General Registers Office

**EFFECTIVE FOOD SAMPLING**

**Part 2**

**Managing Food Sampling**

## 1 Introduction

The purpose of this document is to define the requirements for an effective sampling regime that will meet local authority obligations for the delivery of Official Controls for food. In this context 'effective sampling' can be broken down as follows:

- **Intelligence-led sampling:**  
**Samples taken where there is intelligence pointing to a potential non-compliance and where there is a presumption that failure of the sample will result in an appropriate intervention. In such cases samples must be taken, handled and analysed in a way that provides adequate evidence for appropriate action to be taken on a failure, in line with the local authority's food sampling policy.** Samples in this category include those taken to trace the source of non-compliance detected in a previous sample result to an individual food business operator. Examples of sources of intelligence would include knowledge gained through Official Control inspections about an inadequate production process, results of survey sampling, and information based on customer complaints. The test parameters for such samples are likely to be relatively well defined and good intelligence will be reflected by a high rate of sample failure.
- **Monitoring specific trends:**  
**Where there has been a specific change in terms of legislation, enforcement or technology, or an emerging issue that is expected to lead to change that is detectable in the composition or contamination of food, sampling may be an effective method of assessing whether industry is responding appropriately.**
- **Verification of the system of Food Controls:**  
**An effective Official Controls regime should be reflected in a high proportion of satisfactory results from background survey sampling. Failed samples may point to a need to improve food controls employed by food businesses or indicate that Food Authority Official Controls are not being effective and identify areas where official controls could be improved. Survey sampling is also required to detect supply routes that are circumventing the Official Controls regime through fraud, unregistered / unapproved establishments or unknown imports. The basis for this type of sampling is described below:**
  - a. **A proportion of this class of sample may be aimed at verifying the effectiveness of controls for locally produced food and the 'home authority' Official Controls** and should be targeted at local producers. However, an Official Controls programme should not be designed to provide quality assurance information for small food processors but to verify the systems of control applied by individual businesses. It should also provide information that can verify that the local authority's system for concluding that controls in businesses are adequate. Continued failure of samples could point to a need to change to the system of Official Control delivery by the local authority.
  - b. **A proportion of effort in this class of sampling should be taken as close as possible to the supply to the final consumer.** The parameters for analysis / examination and the targeting of sampling should be determined using the best information available about the types of product and test parameters of most importance in protecting consumer interests. Testing should be aimed as far as possible at the broadest detection of issues

identified so as to capture the widest range of possible faults and abuses, which in turn may result in consequent intelligence-led sampling.

## **2 Food Sampling Policy**

As well as being a requirement of the Food Safety Act Code of Practice SFELC believes that food sampling is an integral component of every LA's enforcement activity. The key to ensuring the effective use of sampling resources by any local authority is the preparation of a suitable food sampling policy and sampling programme. The Code requires this policy to be prepared and published.

Each LA's sampling policy is an overview of, and commitment to, the Food Authority's general approach to food sampling and its approach in specific situations. SFELC recommends that a food sampling policy should include discussion of the following factors.

- *general approach to food sampling*
- *prioritisation of sampling*
- *specific situations*
  - *process monitoring,*
  - *Home Authority Principle,*
  - *inspections,*
  - *complaints,*
  - *special investigations*
  - *local initiatives*
- *SFELC co-ordinated programmes.*
- *FLG co-ordinated programmes*
- *Participation in other programmes*
- *Effective use of sampling resources*
- *Involvement in national collation, eg FSS*
- *Links between sampling and enforcement policies*
- *Identification of resources*
- *Analysis arrangements*
- *Dealing with analysis results*

An example of a sampling policy is shown in Sampling Toolkit Tool1

The sampling policy should be used, together with guidance from SFELC and FSA, to prepare each LA's sampling programme.

## **3 Food Sampling Programme**

The Sampling programme is prepared each year by each LA and is influenced by the Sampling Policy and the profile of businesses within the area. The programme is not normally published.

SFELC is aware that assistance is needed on targeting sampling resources both in terms of samples and analyses selected. Sampling Toolkit Tool 3 and 4 give advice on prioritising sample and analysis selection. This advice will be updated by the SFELC RWG using FSS data.

SFELC recommends that a food sampling programme should include the following factors.

- food sampling priorities.
- Intended sampling based on the number, type and risk ratings of the food businesses and the type of food produced in the area
- Intended sampling to support home or originating authority responsibilities
- Intended sampling to ensure that the provisions of food law are enforced
- A timetable of sampling

Sampling Toolkit Tool 3 gives advice on prioritising businesses to sample from. The prioritisation is based on statutory obligations, effective food safety enforcement and optimising the value obtained from sampling. Businesses are split into three priority levels.

**SFELC advises that an effective sampling programme would embrace all businesses within an LA area that are categorised as Priority 1 or 2.**

Sampling Toolkit Tool 4 uses data gathered from surveys and FSS to guide LAs on selecting sample types and analysis suites within businesses. The advice highlights food and analysis combinations which pass or fail more regularly as well as combinations where there is a lack of sample data. This Tool will be regularly reviewed as the sampling database evolves.

**SFELC advises that priority should be given to food and analysis combinations categorised as Group A or Group C.**

An example of a sampling programme is shown in Sampling Toolkit Tool 2

#### **4 Resources**

Local authorities must ensure that adequate resources are provided to ensure the effective operation of the sampling policy and the sampling programme.

The resources which are required to operate an effective food sampling policy and programme can be grouped into three headings:

- Sampling personnel
- Sampling equipment and facilities
- Analysis and examination

As well as planned sampling contingency arrangements should be in place to allow resources to be identified and applied during incidents, unusual investigations or other unexpected events.

#### **Personnel**

The Code of Practice gives guidance on qualifications for staff engaged in food sampling activity. The SFELC Competency Matrix for Local Authority Enforcement Officers gives further advice on qualifications and training for authorised officers.

When planning a sampling programme it is essential that cognisance is taken not only of the time required to sample but of time likely to be needed to pursue the results of the samples. The value from sampling is greatest when the results can be used to effectively direct enforcement activity.

#### **Sampling equipment and facilities**

Adequate equipment and facilities must be provided to ensure sampling staff can operate effectively. Sampling Toolkit Tool 5 lists equipment which LAs should ensure sampling staff have access to.

### **Analysis and examination**

The fees charged by Public Analyst laboratories are a significant component in the resources required for food sampling. SFELC recommends that LAs ensure that they work with their partner laboratories to extract the best value from limited resources.

Public Analysts should be involved in the formulation of sampling programmes and cognisance should be taken of the advice in Sampling Toolkit Tools 3 and 4 to ensure that the most appropriate combinations of premises, sample types and analyses are obtained.

## **5 Sample information and sampling intelligence**

The Code of Practice requires that a minimum dataset of information is obtained for all samples. Much of this information should also be sent to the laboratory to assist in the assessment of the sample. LAs also need to record much of this information to allow them to administer the sample and, particularly, to pursue any failures.

The Food Surveillance System UK (FSSUK) is a computer based sample recording system which allows sampling staff to record a consistent minimum dataset of information, to pass this to the laboratory and for the laboratory to add the results of analysis. The resulting data is held in a national database allowing local and national interpretation of sampling activity and food quality.

SFELC believes that routine use of FSSUK is fundamental to sampling activity not only in ensuring LAs collect all essential sample information, but in allowing sampling data to be pooled and allowing guidance and advice to be formulated to ensure the most effective and efficient use of resources.

Sampling Toolkit Tool 7 shows the information which should be recorded for all food samples

**SCOTTISH FOOD ENFORCEMENT LIAISON COMMITTEE**

**Enforcement Resources Group**

**EFFECTIVE FOOD SAMPLING**

**Part 3**

**Sampling Toolkit**

## **Part 3 – Sampling toolkit**

### **Introduction**

This part of the Effective Sampling guidance aims to provide a set of resources and tools which help target effective sampling and are an aid to officers engaged in food sampling activity.

It is hoped that this will be a “live” document and any suggestions for changes, enhancements or additions should be directed to SFELC’S Food Standards Sub-Committee via local Food Liaison Group representatives.

### **Contents**

The Toolkit consists of a number of Tools covering the following matters.

1. Example of a Sampling Policy
2. Example of a Sampling Procedure
3. Sampling priorities
4. Selecting samples and analysis suites
5. Sampling equipment
6. Sample labels
7. Sample information - FSS
8. Dealing with results – informal microbiological samples
9. Dealing with results – informal chemical samples
10. Formal samples – administration and dealing with results
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SFELC Sampling Toolkit	<b>Tool 1</b>	Version: 1.0
<b>Example Food Sampling Policy</b>		Date: September 2011

**Anywhereshire Council  
Food Sampling Policy**

Anywhereshire Council is required to undertake routine sampling, with any sampling being undertaken in accordance with current approved codes of practice, regulations and guidance.

The Council believes that sampling is an important, and integral, tool in food law enforcement for the following reasons.

- Protecting public health
- Detecting and deterring fraudulent activities
- Verifying that official control checks are effective
- Giving customers sufficient information to make informed choices
- Ensuring that food standards are maintained
- Informing the enforcement approach
- Providing product quality advice to the producer
- Promoting fair trade and deterring bad practice

Sometimes sampling is the only way of fulfilling these objectives; often it is a support to other interventions by authorised officers.

Sampling has particular benefits in supporting work on food complaints, food safety and standards inspections (including process monitoring), the Home Authority Principle and surveys. There is also a role in the Council’s involvement in special investigations and local initiatives.

**Organisation of sampling**

Food law enforcement, and sampling, is a function carried out by the Environmental Health department. The service is managed by **XX YYY** who is the Council’s Lead Officer for food safety.

All sampling will be undertaken in accordance with relevant legislation and codes of practice, as well as guidance and procedures issued under this policy.

**Sampling Programme and prioritisation of sampling**

A Sampling Programme will be produced every year. The programme will be discussed with the council’s Public Analyst and will be informed by guidance from the Scottish Food Enforcement Liaison Committee.

The Council views sampling as an important component of all enforcement work but particular benefits are linked to complaints

When prioritising sampling The Council will prioritise sampling in three categories.

Priority 1 - Samples required to meet statutory obligations

- Complaint samples

- Scottish Food Enforcement Liaison Committee coordinated surveys
- Food Liaison Group surveys
- Imported food sampling by port health authorities

#### Priority 2 - Samples required for effective food safety enforcement

- Microbiological samples from high risk (Category A & B) food hygiene premises
- Chemical sampling (including those taken during food standards inspections) from producers, packers or importers sending food outwith Anywhereshire.
- Microbiological samples of high risk foods from other food hygiene premises
- Sampling of foods or from premises highlighted by national sample collation
- Imported food sampling by inland authorities.

#### Priority 3 - Samples which give added value or which support local initiatives and projects

- LA surveys
- Sampling to support local initiatives
- Sampling to support other LA services

The Council aims to prioritise samples falling into Priority 1 and Priority 2 classifications. Resources will be devoted to Priority 3 samples whenever possible.

### **Resourcing sampling**

Food sampling is carried out by officers in the Environmental Health Department. As well as staff resources the Council will ensure adequate resources are committed for

- sample collection
- sampling equipment
- transport of samples
- analysis or examination of samples

The Council has appointed Anywhere City Council to provide Public Analyst and Food Examiner services

In ensuring the most effective use of sampling resources the council will seek to follow any advice from the Scottish Food Enforcement Liaison Committee and other agencies.

The Council believes that local authorities working together can pool resources and gain added value from their sampling work. The Council participates in the Food Surveillance System UK (FSSUK) which is a Food Standards Agency funded sample and result collation mechanism. Data from FSS is used to target sampling activity and guide councils on getting best value from sampling resources.

### **Sampling and Enforcement**

Food samples are an enforcement tool and results are considered in terms of the Council's Food Safety Enforcement policy as well as our procedure for dealing with the results of food samples.

### **Review**

This sampling policy, and any programme, guidance, or procedure issued thereunder, will be reviewed whenever there are substantial changes to the activities to which it relates and not later than 2 months from the anniversary of its inception

If it is established that the sampling policy and programme are not being adhered to, the appropriate staff will be retrained and/or the policy/programme reviewed to more accurately reflect the activities being carried out.

SFELC Sampling Toolkit	<b>Tool 2</b>	Version: 1.0
<b>Example Food Sampling Programme</b>		Date: September 2011

**Anywhereshire Council**  
**Food Sampling Programme 2011/12**

The Council's priorities will be:

- Complaint samples
- Scottish Food Enforcement Liaison Committee coordinated surveys
- Food Liaison Group surveys
- *Imported food sampling by port health authorities*
- Microbiological samples from high risk (Category A & B) food hygiene premises
- Chemical sampling from producers, packers or importers sending food outwith Anywhereshire.
- Microbiological samples of high risk foods from other food hygiene premises
- Sampling of foods or from premises highlighted by SFELC's RWG
- *Imported food sampling by inland authorities*

**Planned sampling**

Estimated Number of samples	Premises Type	Commodity	Analysis suite	Cost	Sampling period
xx	Any	Food complaints	A1	£xx	All
xx	Any	SFELC surveys	S1	£xx	All
xx	Any	FLG surveys	S2	£xx	All
xx	Local caterers making own pate	Pate	Z9	£xx	
xx	Local caterers (All Food Hyg Cat A/B)	Prepared dishes	Z9	£xx	
xx	Meat products plants (All plants selling food outwith area)	Meat products	B1	£xx	April - July
XX	Local butchers (All Food Stds Cat A/B)	Meat products	B1	£xx	August - October
	etc				

SFELC Sampling Toolkit	<b>Tool 3</b>	Version: 1.0
<b>Sampling priorities</b>		Date: September 2011

LAs should devise food sampling programmes and policies which ensure they meet their statutory obligations and which allow them to support effective food safety enforcement. There is also a valid use for food sampling by LAs to support other work or initiatives in which they engage, often as part of the wider environmental health agenda.

This guidance splits samples into three categories. It is based on statutory obligations, the Framework Agreement and the Home Authority Principle. This categorisation depends on all LAs taking responsibility for products originating in their respective areas.

Priority 1 – Samples required to meet LA’s statutory obligations

Priority 2 – Samples required for effective food safety enforcement

Priority 3 – Samples which give added value or which support local initiatives and projects.

**SFELC advises that an effective sampling programme would embrace all businesses within an LA area that are categorised as Priority 1 or 2.**

#### Priority 1

- Complaint samples
- National (SFELC coordinated) surveys
- FLG surveys
- Imported food sampling by port health authorities

#### Priority 2

- Microbiological samples from high risk (Category A & B) food hygiene premises
- Chemical sampling from producers, packers or importers sending food outwith the LA area
- Microbiological samples of high risk foods from other food hygiene premises
- Sampling from premises producing food categorised as Group A in Tool 4
- Imported food sampling by inland authorities.

#### Priority 3

- LA surveys
- Sampling to support local initiatives
- Sampling to support other LA services

SFELC Sampling Toolkit	<b>Tool 4</b>	Version: 1.0
<b>Selecting samples and analysis suites</b>		Date: September 2011

Once premises are identified for sampling it is important that some thought is given to the selection of food for sampling and the analysis which will be requested. This allows sampling work to be focussed and value optimised.

Using data from previous surveys and the FSS database it is becoming possible to identify particular combinations of food and analyses which have significant pass or fail rates as well as combinations where little data is available.

This guidance splits combinations into three categories. The aim is to focus sampling on known problem areas and areas where standards exist but where little data is available. The guidance will evolve as FSS data, in particular, is interrogated and this Tool will be reviewed on an annual basis by RWG.

Group A – food and analysis combinations known to have a higher, or significant, failure rate.

Group B – food and analysis combinations known to have a higher, or significant, pass rate.

Group C – food and analysis combinations for which standards exist but where little analytical data is available.

**SFELC advises that priority should be given to food and analysis combinations categorised as Group A or Group C.**

#### Group A

- Microbiological sampling of prepared meals from caterers
- Microbiological sampling of pate made by caterers
- *L.monocytogenes* in foods containing mayonnaise, cream and egg-based products
- Sulphur dioxide preservative in mince and meat products
- Colours in ethnic meals
- Colours in imported sweets
- Labelling of meat products

#### Group B

#### Group C

- Aflatoxins in grains
- Sodium nitrate in bacon

SFELC Sampling Toolkit	<b>Tool 5</b>	Version: 1.0
<b>Sampling equipment and facilities</b>		Date: September 2011

The type of sampling equipment needed will be greatly affected by the business profile within any LA area. LAs may also make arrangements to share equipment, to access it from colleagues elsewhere or to have it supplied by their partner laboratory.

The list below details equipment and facilities which LAs may need access to.

- Carrying cases
- Notebooks
- Appropriate Personal Protective Equipment
- Lockable or secure temperature monitored fridge (less than 5C)
- Lockable or secure freezer (-18 C)
- Insulated boxes
- Adequate supply of hard frozen ice blocks
- Food grade sampling bags
- Sample Labels
- Seals
- Disposable paper towels
- Blue plasters
- Bowls
- Measuring jugs
- Funnels
- Chopping boards
- Scissors
- Knives
- Spoons
- Can Openers
- Sample containers
- Glass bottles
- Thermometer (Calibrated)
- Disinfectant wipes
- Sterile sample jars
- Sterile knives and spoons as necessary
- Swabbing equipment
- Water sampling bottles
- Disposable gloves

More specialised equipment will be required where samples are obtained in more unusual circumstances, particularly the sampling of bulk product.

SFELC Sampling Toolkit	<b>Tool 6</b>	Version: 1.0
<b>Example Sample Labels</b>		Date: September 2011

**Formal Sample**

<b>Anywhershire Council - Environmental Health Food Sample for chemical analysis</b>			<b>FORMAL SAMPLE</b> <b>Premises:</b>
Number	Seal		<b>Address:</b>
<b>Date</b>	<b>Time</b>	<b>Officer</b>	<b>Signatures:</b>
<b>Commodity:</b>			<b>Sampling Officer</b>
			<b>Witness</b>

**Informal**

<b>Anywhershire Council - Environmental Health Food Sample for chemical analysis</b>		
Number		Seal
<b>Date</b>	<b>Time</b>	<b>Officer</b>
<b>Commodity:</b>		

**Informal (FSS generated)**

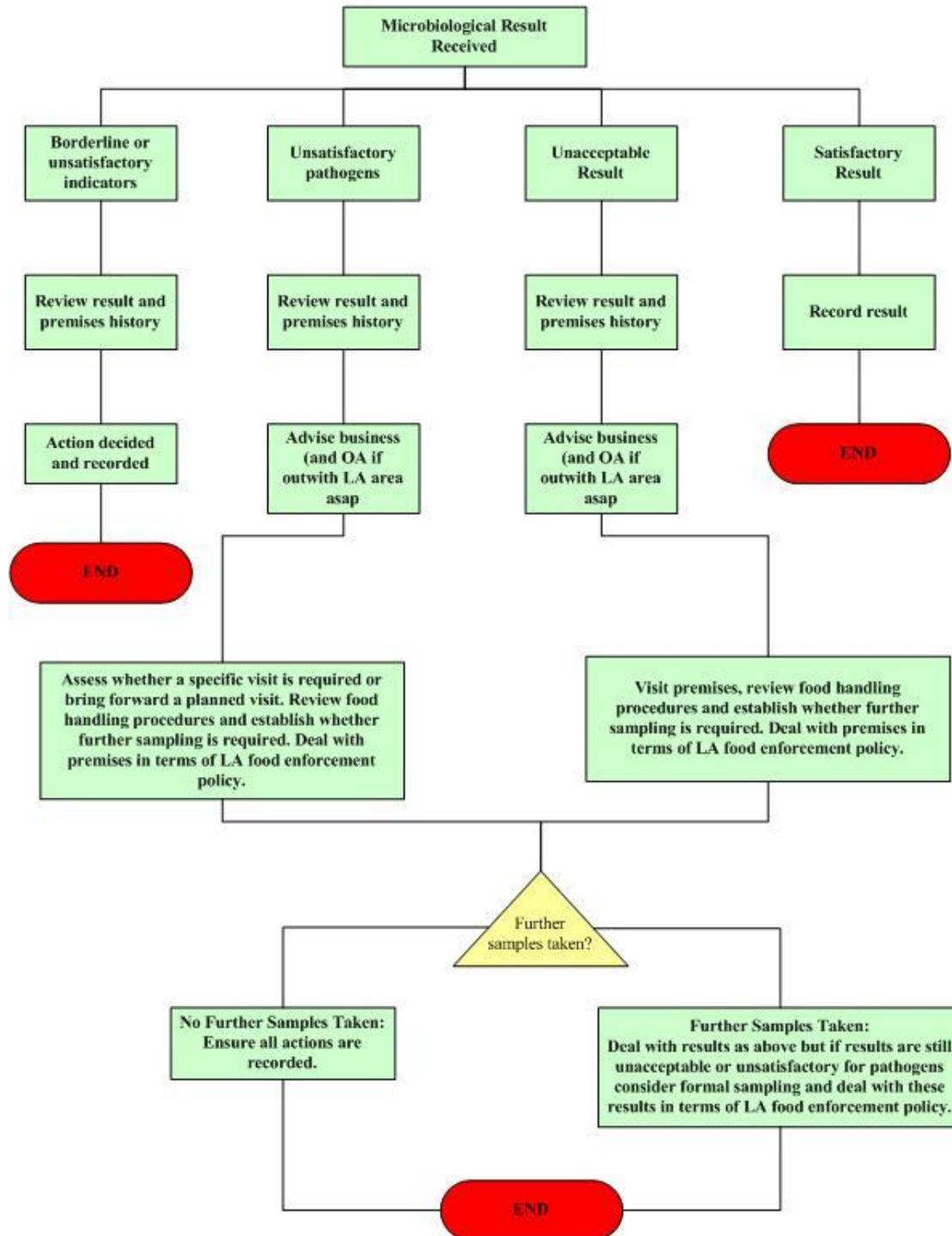
<b>Local authority</b>	
<b>Office</b>	
<b>Food description</b>	
<b>Officer</b>	
<b>Sample number</b>	
<b>Nat. sample Number</b>	<b>BARCODE</b>



SFELC Sampling Toolkit	<b>Tool 7</b>	Version: 1.0
<b>Sample Information - FSSUK</b>		Date: September 2011

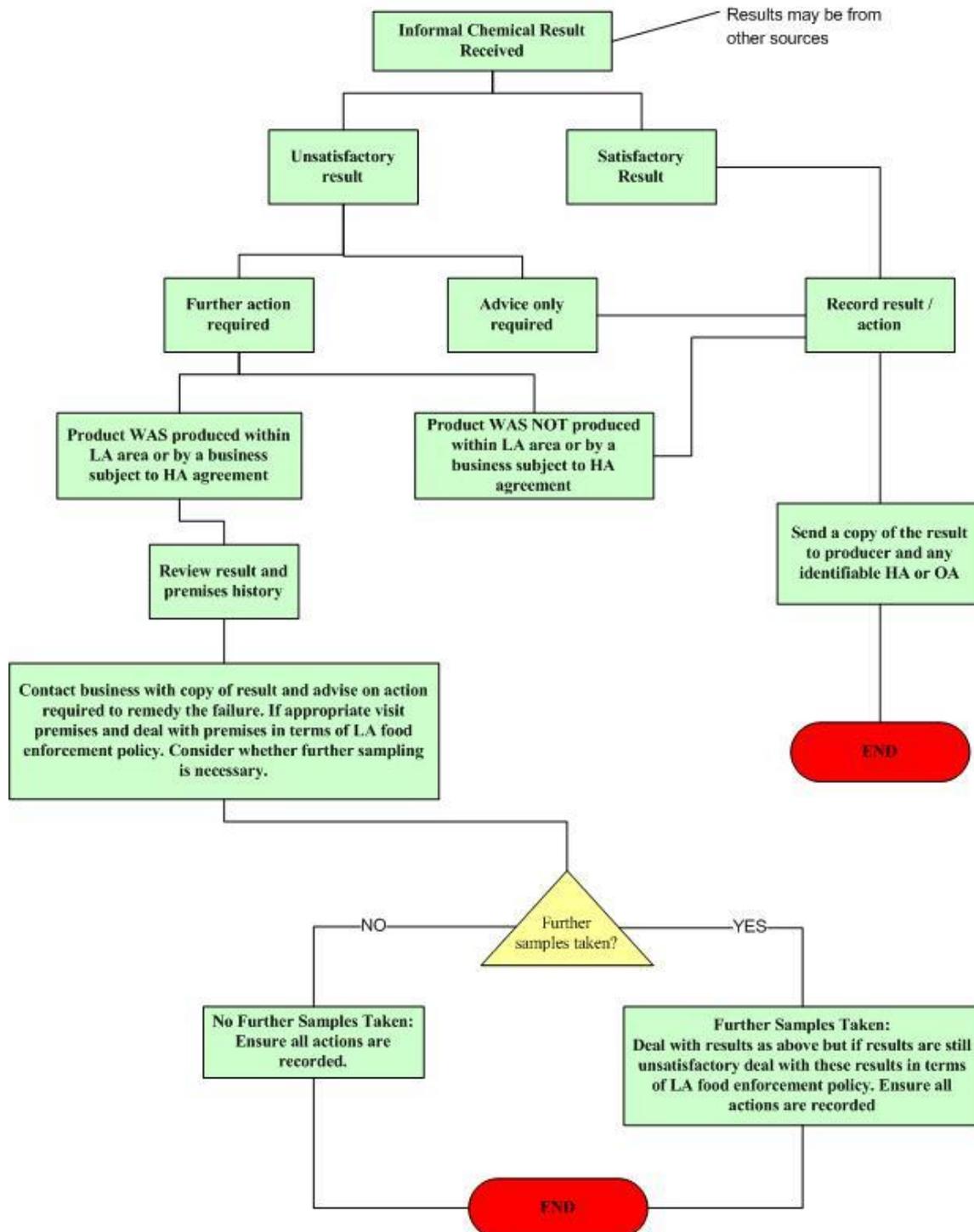
<p><b>Admin</b></p> <p>Sample number  National reference  Analysis type  Office  Sample officer  Sample date  Business ID  Premises name  Premises address  Food safety risk category  Food standards risk category  Premises type  Purchase cost</p>	<p><b>Reason</b></p> <p>Reason sample taken  Sample type  Follow Up sample?  * Index sample number  Food borne illness investigation?  * Details  Sample taken as part of a survey?  * Survey body  * Survey ref</p>
<p><b>Description</b></p> <p>Brand name  Food description  Nature of product  Food category (category tree)  FSA code  Sample taken from (microbiology only)  Manufacturer  Distributor/supplier/packer  Importer  Country of origin  Additional  Packaging provided  Packaging material  Pack quantity/size  Bath/lot no  Health mark  Durability  Condition  Temperature</p>	<p><b>CoP</b></p> <p>Taken in compliance with CoP and relevant legislation?  Transported to lab in compliance with CoP?  Analysis  Additional information</p>

## Informal Microbiological Results



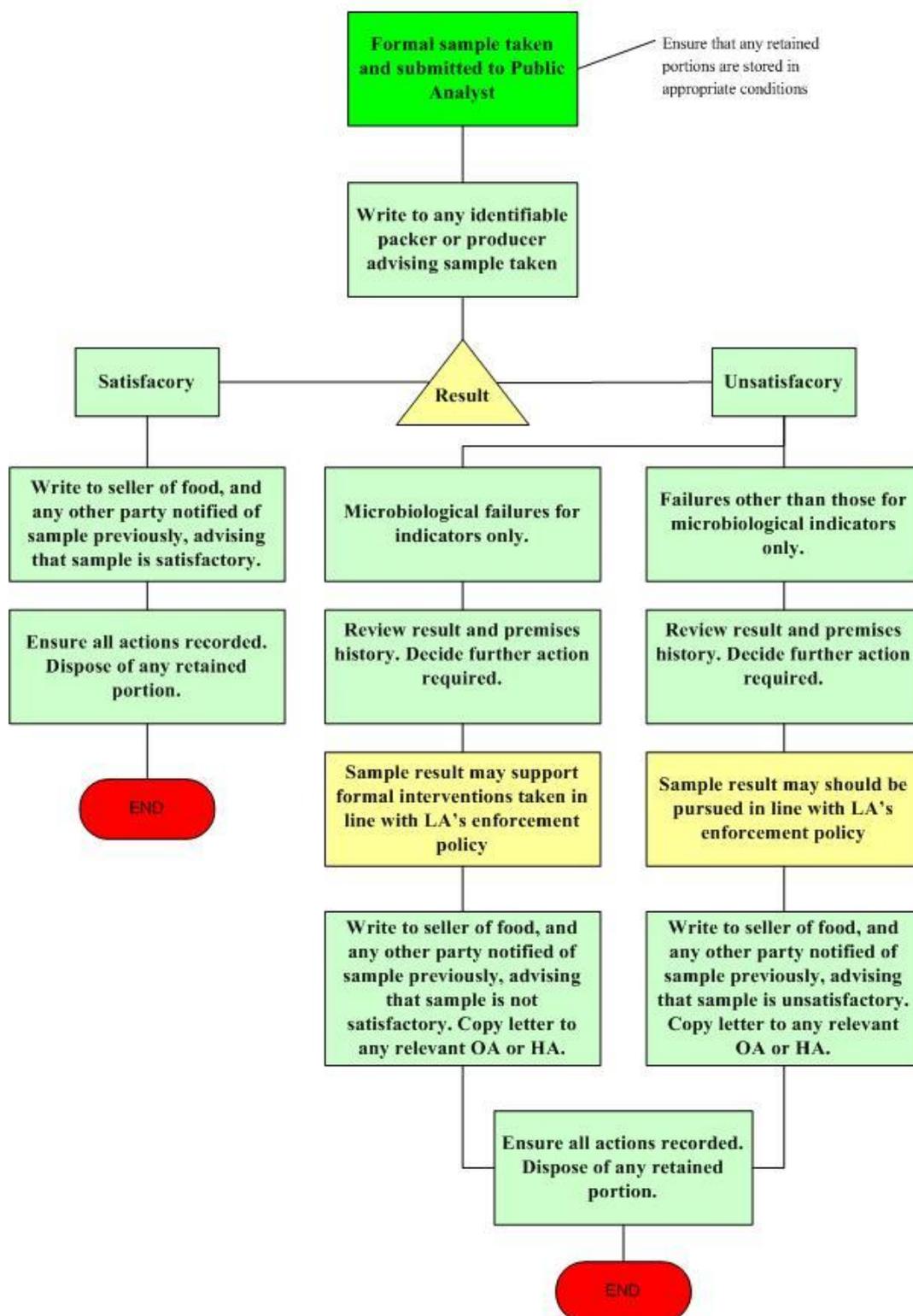
SFELC Sampling Toolkit	<b>Tool 9</b>	Version: 1.0
<b>Dealing with results - Informal chemical results</b>		Date: September 2011

## Informal Chemical Results



SFELC Sampling Toolkit	<b>Tool 10</b>	Version: 1.0
<b>Formal samples – administration and dealing with results</b>		Date: September 2011

## Effective Sampling Tool 10



SFELC Sampling Toolkit	<b>Tool 11</b>	Version: 1.0
<b>Formal sampling proformas</b>		Date: September 2011

**11.1 Formal chemical sample (not spirits)**

**ANYWHERE SHIRE COUNCIL ENVIRONMENTAL HEALTH  
FOOD SAFETY ACT 1990- OFFICIAL SAMPLING**

PREMISES		DATE/TIME	SAMPLE NO. <b>C</b>
COMMODITY ASKED FOR		COST	AMOUNT TENDERED
VENDOR(name, address, designation)			EMPLOYER
Sample taken from			
Quantity	Durability	Lot Number	
Packer's Address (if not on standard list)			

**TICK TO CONFIRM THE FOLLOWING**

- Sampling Officer produced authorisation, intimated identity and explained that official sample(s) had been purchased.
- Sampling Officer offered vendor opportunity to witness proceedings.
- Vendor accepted invitation
- Vendor declined invitation.
- Other person witnessed proceedings. State name, address, designation.
- Sampling Officer invited vendor/other person to confirm containers and bags all clean, dry and empty.
- Witness confirmed containers and bags all clean, dry and empty.
- Sampling Officer mixed samples and divided approximately equally between three containers/bags.
- Closed, sealed and labelled each container/bag
- Placed each container/bag into a bag and sealed with tamper evident tag.
- Sampling Officer displayed samples and asked vendor/other person to select one portion.
- Sampling Officer explained that the selected portion should be retained and that proprietor of business could have this sample analysed at own cost
- Sampling Officer explained that one of the remaining samples would be submitted to Public Analyst for analysis and the other would be retained at Environmental Health Office

SAMPLING OFFICER

WITNESS

**Vendor Seal No.**

**Analyst Seal No.**

**Retained Seal No.**

11.1 Formal chemical sample (spirits)

**ANYWHERE SHIRE COUNCIL ENVIRONMENTAL HEALTH  
FOOD SAFETY ACT 1990 - OFFICIAL SAMPLING**

Premises		Date/time	
Vendor (name, designation)		Cost	Amount tendered
		Employer	
Sample No.	<b>A</b>	<b>B</b>	
Commodity			
Alcoholic strength			
Bottle size			
Lot number			
Bottler			
Vendor Seal #			
Analyst Seal #			
Retained Seal #			

**TICK TO CONFIRM THE FOLLOWING**

- Sampling Officer produced authorisation, intimated identity and explained that official sample(s) had been purchased.
- Sampling Officer offered vendor opportunity to witness proceedings.
- Vendor accepted invitation
- Vendor declined invitation.
- Other person witnessed proceedings. State name, address, designation.
  
- Sampling Officer invited vendor/other person to confirm containers and bags all clean, dry and empty.
- Witness confirmed containers and bags all clean, dry and empty.
  
- A      B
- Sampling Officer mixed samples in container, and divided approximately equally into portions between three containers.
- Capped, sealed and labelled each container
- Placed each container into a bag and sealed with tamper evident tag.
  
- Sampling Officer displayed samples and asked vendor/other person to select one portion of each sample.
- Sampling Officer explained that the selected portion(s) should be retained and that proprietor of business could have these sample(s) analysed at own cost
- Sampling Officer explained that one portion of each sample would be submitted to Public Analyst for analysis and the other would be retained at Environmental Health Office.

**Sampling officer:**

**Witness:**

SFELC Sampling Toolkit	<b>Tool 12</b>	Version: 1.0
<b>Example template letters – informal samples</b>		Date: September 2011

### 12.1 Satisfactory result

Dear

**Food Safety Act 1990**  
**Sampling point address**  
**Food sample number(s):**

I write to confirm the results of the microbiological examination / chemical analysis of sample(s) recently taken from these premises.

Date	
Sample Number	
Product	
Result	Satisfactory

### 12.2 Unsatisfactory chemical result

Dear

**Food Safety Act 1990**  
**Sampling point address**  
**Food sample number(s):**

I write to confirm the results of the chemical analysis of sample(s) recently taken from these premises.

Date	
Sample Number	
Product	
Result	Unsatisfactory

A copy of the Public Analyst's report(s) is/are attached and you should take immediate steps to remedy the issues identified.

Please advise me of the actions you have taken to resolve this issue.

### 12.3 Unsatisfactory or borderline microbiological indicator results

Dear

**Food Safety Act 1990**  
**Sampling point address**

**Food sample number(s):**

I write to confirm the results of the microbiological examination of sample(s) recently taken from these premises.

Date	
Sample Number	
Product	
Result	Satisfactory/Borderline/Unsatisfactory

The notes below will help you understand the results.

You should review your procedures for the handling and storage of such products to ensure that they maintain a satisfactory microbiological quality.

**Colony count** is an indication of the total number of bacteria in the food.

**Enterobacteriaceae** are a group of bacteria which can be associated with poor hygiene

**Staphylococcus aureus** is a bacteria which indicates poor personal hygiene. It can cause food poisoning

The Scottish Food Enforcement Liaison Committee has endorsed the Health Protection Agency (HPA) microbiological criteria for various foods. These range from “satisfactory”, via “borderline” and “unsatisfactory”, to “unacceptable”.

**We expect all food samples to have results in the “satisfactory” category**

SFELC Sampling Toolkit	<b>Tool 13</b>	Version: 1.0
<b>Example template letters – formal samples</b>		Date: September 2011

**13.1 Notification that formal sample has been taken**

Dear

**Food Safety Act 1990**

**Formal food sample number(s):**

I write to advise you that the following formal sample(s) have been taken and submitted for analysis/examination.

Date	
Sample Number	
Product	
Sampling point	

I will write to you when the results of analysis/examination are available.

**13.2 Notification of satisfactory formal sample result**

Dear

**Food Safety Act 1990**

**Formal food sample number(s):**

I write to advise you that the following sample result(s) is/are available,

Sample Number	
Product	
Result	Satisfactory

I will write to you separately about any other samples taken at the same visit.

SFELC Sampling Toolkit	<b>Tool 14</b>	Version: 1.0
<b>Information leaflets</b>		Date: September 2011

## **14.1 Draft Text of microbiological sampling leaflet for traders**

### **Scottish Food Enforcement Liaison Committee Sampling food for microbiological examination**

#### **Why are microbiological samples taken?**

Your local Council Environmental Health Department take microbiological samples to help monitor the safety of food and food hygiene practices in production and retail premises.

Many samples will be taken anonymously where an officer will purchase the food as an ordinary shopper unknown to the proprietor to check that the food is safe to eat. Samples can also be taken during routine inspections.

Samples of food and environmental swabs are submitted to an approved laboratory for examination.

#### **What are the samples tested for?**

Microbiological examination of food allows us to compare the levels of different bacteria found against those we expect to find in similar types of product. This helps us to assess whether the food was manufactured safely, handled hygienically, stored correctly or would be a risk to health if consumed.

Food is usually tested for some, or all, of the following bacteria:

- Aerobic Colony Count
- Escherichia coli
- Enterobacteriaceae
- Staphylococcus aureus
- Clostridium perfringens
- Bacillus cereus and Bacillus species
- Listeria species
- Salmonella species
- Campylobacter species

The **Aerobic Colony Count (ACC)** is the total number of bacteria found in food. This examination is usually carried out on most foods, the exception being those foods that would naturally contain high levels of harmless bacteria e.g. salamis and milk products. A high ACC may indicate the product has been kept too long or that it has been left unrefrigerated. (Cold food) or not kept hot enough (Hot food)

**Escherichia coli (E coli)** is a bacterium, which is found in the gut of man and animals. It may be transmitted through faecal contamination at slaughter or through poor personal hygiene of food handlers. Their presence in cooked foods is indicative of poor personal hygiene – not washing hands after going to the toilet. There is a strain of E coli (EO157) which can cause serious illness, this bacteria is associated with meat e.g. burgers. The centre temperature of meats should reach at least 70°C for two minutes, or equivalent temperature/time combination, or until the juices run clear.

Always ensure cooked foods are separated from raw.

**Enterobacteriaceae** includes bacteria that naturally inhabit the gut of man and animals but some are widespread in the environment. Enterobacteriaceae are useful indicators of hygiene and of post processing contamination of processed foods (i.e. from dirty machinery). Some of these bacteria are found in the environment and are therefore commonly found in salad/vegetable products or in cooked foods coming into contact with raw foods. It is essential therefore that salads are thoroughly washed, that all equipment be thoroughly cleaned and that cooked and raw foods are kept separate.

**Staphylococcus aureus** is bacterium that can produce a toxin in food that can cause food poisoning. This bacterium is found in the nose and mouth of humans and in uncovered wounds, cuts, spots, boils etc. The presence of these bacteria in food is usually due to poor personal hygiene combined with bad food handling practices. It is essential that hands are washed before handling food.

**Clostridium perfringens** is a bacterium that is found in the gut of animals and humans and in the environment. Some strains can cause food poisoning. Cooking rapidly for sufficient time will reduce its presence. It is also essential to prevent cross contamination from raw to cooked foods, especially uncooked meats.

**Bacillus species and specifically Bacillus cereus**, are food poisoning bacteria. Bacillus is widely distributed in the environment, and therefore found on grains, beans, pulses etc. It is essential that foods are cooked thoroughly, and if not being served immediately they must be cooled rapidly. This bacterium is usually associated with rice dishes where large volumes of food are produced in advance and may be cooled slowly over several hours. Refrigeration slows down growth.

**Listeria species especially Listeria monocytogenes** are found in the environment and is usually associated with salads, pates and soft cheese. Its presence in cooked foods can be an indication of insufficient cooking or contact with raw foods. This bacterium can grow well at refrigeration temperatures. It is essential that foods are cooked thoroughly and covered, and that all equipment and surfaces are cleaned thoroughly.

**Salmonella** species are food poisoning bacteria which can be found in the intestines of animals, humans and in polluted waters. Salmonella may be present in food due to insufficient cooking, cross contamination from raw food to cooked foods, the use of raw eggs in uncooked dishes or due to poor personal hygiene.

Some **Campylobacter** bacteria are known to cause food poisoning. This bacterium is found in the gut of some animals. Its presence in foods may be due to insufficient processing or cooking (e.g. unpasteurised milk, uncooked centre of rolled meat joints) or contamination by pets and other domestic animals. Food must be cooked thoroughly and once cooked not allowed to come into contact with raw foods or pets.

#### **How are the results reported?**

*The Scottish Food Enforcement Liaison Committee has endorsed the Health Protection Agency (HPA) microbiological criteria for various foods.* Most microbiological samples are reported in the following categories:

**Satisfactory** : Means that the bacteria found were at acceptable levels;

**Borderline**: There were higher than expected levels of bacteria. Proprietor must review systems of work to ensure that safe food is produced;

**Unsatisfactory** : This indicates problems with food handling. An urgent review of food handling procedures is required to ensure that food does not cause food poisoning;

**Unacceptable / Potentially Hazardous** : Consumption of this food may cause illness. Immediate action is required.

#### **How can I make sure my food meets the required microbiological standards?**

You should have an effective management system in place which identifies all steps, and controls, in your activities which are critical to food safety.

If you run a catering business you we recommend the CookSafe system, if you handle high risk food in the retail environment RetailSafe may be appropriate. Details of both these systems are available at [www.food.gov.uk](http://www.food.gov.uk) .

#### **Where can I get further information?**

Speak to you local environmental health department. Either contact the last food safety inspector to visit you or use the contact details below

<b>About SFELC</b>	<b>Your local environmental health department:</b>
<i>The Scottish Food Enforcement Liaison Committee (SFELC) co-ordinates the food law enforcement, sampling and surveillance activities of Scottish local authorities and comprises representatives of central and local government, consumers and industry.</i>	

## 14.2 Draft text of leaflet explaining formal chemical sampling

### Food Safety Act 1990 Formal Food Sampling

Our officers visited your premises today and took formal sample(s) to assess compliance with food law.

Each sample was divided into three portions and sealed with a tamper evident seal.

The portions are distributed as outlined below:

1. The Public Analyst receives one portion to establish that the sample complies with food law.
2. The portion of the sample left with you or your employee can be analysed at your own cost if you wish.
3. The third portion, which I have retained, is kept for future presentation in any Court proceedings or for further analysis.

If there was insufficient product to split into three portions, alternative procedures apply.

Once the Analyst's report is available we will contact you.

**You should ensure that you keep your portion of the sample(s) secure until you are advised of the results. Any special storage conditions are shown, with a tick, below:**

Storage type	Recommended	Essential
Ambient		
Refrigerated		
Frozen		

If you need any further information or wish to discuss this matter further please contact the sampling officer at the number above.

## 14.4 Previous or updated version of SFELC MSG and colours guidance

## 14.5 Previous SFELC/CFS/trade water cooler guidance

SFELC Sampling Toolkit	<b>Tool 15</b>	Version: 1.0
<b>Food complaint investigation form</b>		Date: September 2011

Food Complaint Reference Number:	
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**1. Complaint Receipt**

Date:		Time:	
Officer:		Witness:	

**2. Complainant, Purchaser & Witness**

Complainant Name:				
Address:				
Telephone Number:			Email:	
Will you give evidence?	<b>Yes</b>		<b>No</b>	
Can name/address be disclosed?	<b>Yes</b>		<b>No</b>	

Purchaser's Name:				
Address:				
Telephone Number:				
Will you give evidence?	<b>Yes</b>		<b>No</b>	

Witnesses Name:				
Address:				
Telephone Number:				
Will you give evidence?	<b>Yes</b>		<b>No</b>	

**3. Food Details**

Description of Food:					
Nature of Complaint:					
Description of Packaging:					
Product/Durability Codes:					
Weight/Size:					
Purchase Price:					
Receipt available?	Yes		No		
Date of purchase:					
Time of purchase:					
Date Opened:				Time Opened:	
Who Discovered Defect:					
Discovery Witnessed By:					
Details of handling of the food between purchase and discovery:					
Details of any illness/injury caused:					

**4. Seller Details**

Name:					
Address:					
Telephone Number:					
Contact Person/Position:					
Email:					

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Nature of Storage	<b>Frozen</b>		<b>Chilled</b>		<b>Ambient</b>	
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Any similar complaints received?	<b>Yes</b>		<b>No</b>	
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If yes, please give details:


Head Office:	
Address:	
Telephone Number:	
Contact Person/Position:	
Email:	

**5. Manufacturer/Processor/Importer/Packer Details**

Name:	
Address:	
Telephone Number:	
Contact Person & Job Title:	
Email Address:	
Date and Method of Notification:	

Any similar complaints received?	<b>Yes</b>		<b>No</b>	
----------------------------------	------------	--	-----------	--

If yes, please give details:


**6. Home/Originating Authority Details**

Authority Name:	
Authority Address:	
Contact Person:	
Telephone Number:	
Email Address:	
Date and Method of Notification:	
Sample Release Date:	
Sample Return Date:	

**7. Sample**

Sample Number	
Evidence Bag / Seal Number	
Opened/Resealed (Date/Time/Officers/Seal No.)	
Date to PA Lab:	
Result of Analysis/Examination:	

**Declaration by Complainant**

I \_\_\_\_\_ surrender the above mentioned food including any foreign material or substance to Anywhereshire Council’s Environmental Health Department for investigation. The objects were sealed in a bag with the seal number noted above.

I understand that the Anywhereshire Council will not act on my behalf to obtain compensation.

I understand that officers of Anywhereshire Council will decide if it is appropriate to take legal action when the investigation is completed. If legal action is considered necessary, I **AM/AM NOT** \* willing to attend court as a witness.

**I DO/DO NOT\*** wish my name and address to be given to the supplier and/or manufacturer.  
(\*Delete as necessary)

Signed

Date